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5 SELECT COMMITTEE TO INVESTIGATE THE  
6 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
7 U.S. HOUSE OF REPRESENTATIVES,  
8 WASHINGTON, D.C.

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12 DEPOSITION OF: ANGELA MCCALLUM

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16 Wednesday, December 8, 2021

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18 Washington, D.C.

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21 The deposition in the above matter was held in room 5480, O'Neill House Office  
22 Building, commencing at 10:11 a.m.

23 Present: Representatives Lofgren and Aguilar.

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2     Appearances:

3

4     For the SELECT COMMITTEE TO INVESTIGATE

5     THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

6

7     [REDACTED] INVESTIGATIVE COUNSEL

8     [REDACTED], INVESTIGATIVE COUNSEL

9     [REDACTED], CHIEF CLERK

10    [REDACTED] PROFESSIONAL STAFF

11    [REDACTED] STAFF ASSOCIATE

12    [REDACTED], RESEARCHER

13

14

15    For THE WITNESS:

16

17    PAUL BROTHERS, ESQ.

18    Graves Garrett LLC

19    1100 Main Street, Suite 2700

20    Kansas City, MO 64105

1

2 [REDACTED] Good morning. This is a deposition of Angela McCallum, conducted  
3 by the House Select Committee to Investigate the January 6th Attack on the United States  
4 Capitol pursuant to House Resolution 503.

5 At this time, I'd like to ask the witness to please state her full name and spell her  
6 last name for the record.

7 The Witness. Angela McCallum, M-c-C-a-l-l-u-m.

8 [REDACTED] Thank you.

9 So this will be a staff-led deposition. My name is [REDACTED] I'm an  
10 investigative counsel for the committee. And I'm accompanied by my colleague here.  
11 I'll let her introduce herself.

12

13 [REDACTED] And she's also investigative counsel for the committee.

14 And we may have members joining us. Actually, we're going to start off with  
15 Representative Zoe Lofgren here on the screen, and some other members may join as we  
16 go through the process here by video. And I'll do my best to note their appearance  
17 when they sign in, both for you all and for the record.

18 We're also joined here this morning by our chief clerk, who's also on committee  
19 staff, [REDACTED] and, here, [REDACTED], another member of our professional staff.

20 So, under the House deposition rules, neither committee members nor staff may  
21 discuss the substantive testimony that you provide today unless the committee approves  
22 its release. You, Ms. McCallum, and your attorney will have an opportunity to review  
23 the transcript.

24 And, before we begin, I'd like to discuss just a few ground rules.

25 We will follow the House deposition rules that we provided to your counsel

1 previously. Under the House deposition rules, counsel for other persons or government  
2 agencies may not attend, and you are permitted to have your attorney present.

3 Counsel, at this time, would you state your name for the record, please?

4 Mr. Brothers. Yes. My name is Paul Brothers. I'm with Graves Garrett and  
5 counsel for Ms. McCallum.

6 [REDACTED] Great. Thank you.

7 So we have an official court reporter here transcribing the record of this  
8 deposition.

9 Ms. McCallum, have you ever been deposed before?

10 The Witness. No.

11 [REDACTED] Okay. So the ground rules are pretty simple here. We will just ask  
12 for you to please wait for each question to be completed before you respond, and that's  
13 so that the reporter can get everything clearly on the record. We will also try to wait  
14 until your response is completed before asking another question. And we'll ask that you  
15 respond verbally, since the court reporter can't record responses like a nod of the head or  
16 anything -- shaking your head -- like that.

17 So we also will ask that you provide complete responses, complete answers, based  
18 on your best recollection. If the question is not clear, please do ask for clarification, and  
19 we'll be happy to do that. If you do not know the answer, please say so.

20 And you may only refuse to answer a question to preserve a privilege that is  
21 recognized by the select committee. So, if you refuse to answer a question based on a  
22 privilege, staff may either proceed with the deposition or seek a ruling from the chair on  
23 the objection. If the chair overrules an objection, you are required to answer the  
24 question.

25 And I also want to remind you that it is unlawful to deliberately provide false

1 information to Congress. Since this deposition will be under oath, providing false  
2 information could also result in criminal penalties for perjury or providing false  
3 statements.

4 Do you understand that?

5 The Witness. I do.

6 [REDACTED] Okay. Great.

7 I'd ask for you now to -- for the court reporter to swear you in.

8 [Witness sworn.]

9 [REDACTED] Okay. Great. We're ready to proceed?

10 Mr. Brothers. We are.

11 [REDACTED] Great.

12 So I don't think that we're going to take your whole day today, but we will go for  
13 probably a couple of hours. And we will plan to take some breaks, but if at any time  
14 during the questioning you would like a break or you'd like a chance to talk to your  
15 attorney, please let us know and we'll do that.

16 Mr. Brothers. And I should note one thing. I'm not sure if you meant  
17 "proceed" as to ready to start asking questions. I do have a few things I need to put on  
18 the record before we begin.

19 [REDACTED] Sure. This is the right time to do it, so --

20 Mr. Brothers. All right.

21 [REDACTED] -- go right ahead.

22 Mr. Brothers. So let me preface this first by saying, obviously Ms. McCallum is  
23 here. What I am about to say is not grounds that Ms. McCallum is using to not appear  
24 before the committee for a deposition today, nor is it grounds she is asserting to not  
25 answer questions from the committee today.

1           We have some objections to raise to preserve for the record, not to have a ruling  
2           on today, but to have preserved in the event the committee would request further  
3           testimony, further depositions, or further document production.

4           We just want the record to be clear that, for these depositions,  
5           Ms. McCallum -- or, for this deposition, Ms. McCallum's appearance and testimony isn't  
6           waiving these objections, and she reserves the right to raise them at a later time if the  
7           need were to arise.

8           I have four of those objections.

9           The first is that the committee is not properly composed. As the committee is  
10          aware, the resolution forming the committee required the appointment of 13 committee  
11          members. At least five of those members were required to be appointed with  
12          consultation of the minority leader. The Speaker rejected the minority leader's  
13          appointments and the slate of appointments he offered. Because of that -- and  
14          appointed all 13 members on her own. Because of that, there was no consultation with  
15          the minority Member, and Ms. McCallum's position is the committee is not properly  
16          composed.

17          The failure to properly compose the committee resulted in invalidation of all of  
18          the committee's actions, including Ms. McCallum's subpoena.

19          Again, she is here today. She is willing to testify today, but she is preserving that  
20          objection for the record if the need to raise it would arise further down the road.

21          The second objection is similar to the first -- that is, the subpoenas issued by the  
22          committee, including the subpoena for Ms. McCallum, are not properly issued.

23          This, again, goes back to the problems with the composition of the committee.  
24          Because there are no minority appointees of the committee, the committee lacks a  
25          ranking member. This is denoted by Representative Cheney's title as "vice chair" rather

1       than "ranking member."

2               The resolution forming the committee authorizes the committee to compel  
3       witnesses to appear for depositions through subpoena. The chairman has that authority  
4       in consultation with the ranking member. Because the committee does not have a  
5       ranking member due to its composition problems, there has, by definition, been no  
6       consultation between the chairman and the ranking member. This lack of consultation  
7       invalidates the subpoena. The subpoena was not properly issued.

8               Once again, I want to note Ms. McCallum is here today and is not asserting that  
9       objection today to not appear or to not testify, but is merely preserving that objection in  
10      case it needs to be raised in the future.

11              The third objection is Ms. McCallum's subpoena is not supported by a committee  
12      function.

13              We acknowledge the committee is tasked with investigating the causes of  
14      January 6th, and we are aware of the general assertions of the committee that this will  
15      entail an investigation into the certification of election results and allegations of election  
16      irregularities.

17              However, information regarding allegations of election irregularities and  
18      arguments regarding election results certification is already well-known through public  
19      litigation, public statements, and media statements from numerous individuals.

20              Our position is the committee has all the information it needs to inform its inquiry  
21      into what potential legislation in this area may be necessary, and there is no need to  
22      probe the internal operations of a major Presidential campaign through this witness.

23              We do not believe Ms. McCallum's subpoena is in furtherance of a legitimate  
24      committee function. And, once again, we are just asserting this objection to preserve it  
25      for the record, not to prevent Ms. McCallum from appearing today or from answering

1 your questions today.

2 Finally, Ms. McCallum has produced numerous documents to this committee. I  
3 sent a letter along with those documents raising numerous objections regarding  
4 production issues for Ms. McCallum. Those objections still stand, and we want the  
5 record to be clear that Ms. McCallum is not waiving any of the objections in that letter. I  
6 believe they were First Amendment, Fourth Amendment, legislative purpose, pertinence,  
7 common law privileges that were raised in that letter.

8 And Ms. McCallum is not waiving those objections by appearing today or  
9 answering the committee's questions. However, she is here today. She is not  
10 asserting those objections as a basis for not appearing today or as a basis for not  
11 answering questions today.

12 Those are the objections for the record.

13 I also have a few ground rules I would like to propose.

14 I understand that, due to the composition of the committee, there is one  
15 committee staff; we don't have a minority staff. So that makes the traditional rounds  
16 aspect of this deposition difficult. However, we would request that we maintain the  
17 60-minute round format, just allowing everyone a short break every 60 minutes.

18 Second, I understand we have two counsels for the select committee, and my  
19 understanding is both may ask questions. We would request to adhere to a more  
20 traditional deposition format. As counsel are both undoubtedly aware, in a traditional  
21 deposition one attorney is allowed to ask questions. Same thing in a courtroom for an  
22 evidentiary hearing. We would like to remain closer to the traditional format for  
23 depositions.

24 A compromise we are willing to offer would be that, whoever is doing the  
25 questioning, if you would like to switch to the other counsel having questions, we are



1 agreeable to that only after a short break. And then every time that you guys want to  
2 pass back and forth questioning, we would request a short break, just to keep things clear  
3 and organized.

4 We would be open to a more free-flowing conversation where multiple counsels  
5 for the committee could ask questions and just interject in a less formal interview setting,  
6 whether that be transcribed or not. Ms. McCallum made that request, and the  
7 committee rejected it. Because of that rejection, we are requesting to stick closer to the  
8 traditional deposition format.

9 And the last thing, and it's really almost moot at this point, but we do have the  
10 binders of the exhibits you have provided. We did ask to be provided with any  
11 documents that you were going to present to Ms. McCallum that were not part of her  
12 production. [REDACTED] discussed the one document with me right before we went on  
13 the record that pertains to that, and I thank you for that and I appreciate that.

14 And I shouldn't have said that was the last thing. This is the last thing: For  
15 form objections, we would just ask for a stipulation that any potential objections to  
16 hearsay are preserved so those don't need to be stated on the record as a form objection.

17 [REDACTED] Okay -- sorry. Didn't mean to cut you off.

18 Mr. Brothers. I'm --

19 [REDACTED] Is there anything else?

20 Mr. Brothers. No, I'm finished.

21 [REDACTED] That was the last one.

22 Mr. Brothers. Appreciate your patience.

23 [REDACTED] Okay. No problem.

24 All right. Well, let me respond to each of those issues that you just raised --

25 Mr. Brothers. Uh-huh.

1           [REDACTED] -- probably not in the order that you raised them.

2           So I understand that you, just at the beginning of your statements just now,  
3 entered for the record several objections, including to the formation of the committee  
4 and other, sort of, fundamental questions about the select committee's work. But I  
5 understand that you are prepared to answer questions today, notwithstanding the fact  
6 that you stated those objections.

7           With your objections pending, one way that we might need to do that is hold this  
8 deposition open. We can continue as planned today with us asking you some questions,  
9 Ms. McCallum, with you answering those questions or raising privilege objections to  
10 specific questions, if you have them, as you go, and then hold the deposition open to seek  
11 a ruling on those objections from the chair.

12           I don't think, with those objections standing, that we would be prepared to  
13 conclude the deposition today, but it sounds like we can proceed. And I think, with  
14 those having been stated for the record, we can proceed today and see how things go.

15           Mr. Brothers. That's acceptable.

16           [REDACTED] Okay.

17           On the process stuff, I think an hour break is a perfectly acceptable idea for  
18 everybody involved, or maybe even less, depending on the sort of structure here.

19           However, on the manner in which we question, that's not something that we're  
20 prepared to agree to today. Our process is that counsel for the committee -- and here  
21 you have [REDACTED] and myself, but we may be joined by other members of the staff  
22 during the deposition -- each may ask questions. And, in addition, we have our  
23 members who may join, and they may ask questions as we go throughout the deposition.

24           Obviously, we hope that this can be a productive and non-, you know,  
25 confrontational process. So I'm not prepared to accept your limitation on our

1 questioning, but I do suggest that we proceed and see how it goes. We're not in  
2 any -- you know, our goal here is not to badger your client or pester you with questions,  
3 but this is the process that we follow.

4 Mr. Brothers. We can proceed. Certainly, we're not going to let this come  
5 between us in proceeding with the deposition today.

6 I will say: Nontraditional. I mean, the committee insisted on a deposition.  
7 And I think, when the committee is going to insist on a deposition, it should hold a  
8 deposition, not hold some sort of hybrid that it's come up with.

9 I also would note that, you know, that's not common in traditional depositions,  
10 that's not common in courtrooms, and, frankly, that is not common in committee  
11 hearings, public committee hearings. It's not just an open hot bench, if you will, where  
12 members just get to shoot questions and interject.

13 So I don't think that it is appropriate. However, we are willing to proceed.

14 And I think the compromise we can reach is: You guys have your procedures.  
15 We will abide by them. However, I will interject if I feel that we're just rapid-firing,  
16 switching between people, and badgering the witness. I will not allow that, and I will  
17 request a break if that becomes a problem to allow the witness a break from any  
18 badgering.

19 [REDACTED] Yep. We have no intention of badgering your client.

20 So I think it sounds like, with all that being said, we could probably get started  
21 here.

22 Mr. Brothers. I agree.

23 [REDACTED] Okay.

24 Let me, before we do get started, though, allow Ms. Lofgren -- is there anything  
25 you would like to say before we get going with the questioning?

1 Ms. Lofgren. Not at this time. Thank you.

2 [REDACTED] Okay. Great.

3 EXAMINATION

4 BY [REDACTED]

5 Q Okay. So here we are. Ms. McCallum, could we start off with some basic  
6 background about you? Where did you grow up?

7 A I grew up in Greenwood, South Carolina.

8 Q Okay. And where do you live now?

9 A My permanent residency is in Abbeville, South Carolina. I currently reside  
10 in Cayce, South Carolina.

11 Q Okay. That's my first name, so it sounds like a lovely place.

12 Can you walk us through a little bit of your professional background, starting with  
13 where you went to college or any other education that you've received?

14 A Yeah. I graduated from Clemson University with a degree in -- a bachelor's  
15 of science in economics in December of 2019.

16 After that, I interned at the White House in the Office of Cabinet Affairs. I  
17 interned there from the end of January of 2020 until March of 2020. The class was cut  
18 short due to COVID. And, shortly after that, I joined the Trump campaign, working out  
19 of the Arlington, Virginia, headquarters.

20 And, after the campaign, I contracted with the National Republican Senatorial  
21 Committee and worked in Atlanta, Georgia, for the Senate runoff.

22 And I currently work at First Tuesday Strategies in Columbia, South Carolina.

23 Q Okay. Great. Thank you.

24 So, for your White House internship in the early part of 2020, can you give us a  
25 general sense of what your roles and responsibilities were during your internship?

1           A    Yes. I was an intern for the Office of Cabinet Affairs, so anything related to  
2 supporting the Cabinet Secretary. Mostly handled just general office tasks, such as, you  
3 know, updating the whiteboard calendar and things of that nature.

4           Q    Okay.

5           Did you have any role working on the Trump campaign before March 2020?

6           A    No.

7           Q    Okay. And what was your job title when you were first hired by the Trump  
8 reelection campaign?

9           A    Elected officials outreach coordinator.

10          Q    Okay. And, if you can recall, approximately what dates did you serve the  
11 job with that title?

12          A    My job contract with the Trump campaign did not end until the -- I believe it  
13 was the 15th of November. Also, it could be the 30th of November. I'm not sure  
14 exactly what pay period. And, officially, that's the only job title I held. I was an  
15 independent contractor after that point.

16          Q    Okay. So, for the time period before the end of November 2020, were you  
17 a contractor or were you a member of the Trump campaign staff?

18          A    I was on the payroll until November.

19          Q    Okay. Thank you.

20          And what generally were your job responsibilities as the elected officials outreach  
21 coordinator?

22          A    I worked underneath two managers, who were the elected officials outreach  
23 managers. And we reported to the deputy political director.

24          My responsibilities there were just tracking communications between the  
25 managers and State representatives, State senators, county commissioners, county

1 sheriffs, really just anyone on a more local or State level.

2 If, you know, they had a call where they received messaging or talking points of  
3 things that were going on in that particular battleground State, that's something that I  
4 would keep track of and put it into, you know, a weekly report. Or if they had an op-ed  
5 or some other kind of media published, I would just compile that into a report, and it  
6 would just be sent to the deputy political director.

7 Q Okay. Great.

8 During the time period that you held that job, who were the -- you've mentioned  
9 that you reported to two managers. Who were those managers?

10 A Olivia Miller and Nicholas Ivory.

11 Q And they were your supervisors for the whole time that you held that job?

12 A That's correct. Along with Jim O'Connell, deputy political director.

13 Q Okay. Great. And were all of those individuals -- Olivia Miller, Nicholas  
14 Ivory, and Jim O'Connell -- were they working in the Arlington headquarters with you?

15 A That's correct.

16 Q Okay.

17 Were your responsibilities as elected officials outreach coordinator nationwide or  
18 focused on specific States?

19 A Specific battleground States.

20 Q Okay. And which were those?

21 A I can name a couple. I'm not sure that my list will be completely  
22 comprehensive. Georgia, North Carolina, Arizona, Nevada, Michigan, Wisconsin,  
23 Pennsylvania, New Hampshire, Florida. That's all I can think of right now.

24 Q Okay. Thank you.

25 Were you the only elected officials outreach coordinator, or did you have

1 colleagues who had similar job responsibilities to you?

2 A I did not. Madison Crawley held the same role as I did.

3 Q And, between yourself and Ms. Crawley, did you have a specific delineation  
4 of responsibilities to any of these particular States?

5 A No. We just split pretty much all the work 50-50.

6 Q Was Ms. Crawley also in the Arlington headquarters with you?

7 A Yes, ma'am.

8 Q Okay.

9 As the election progressed towards election day, did your job responsibilities  
10 change?

11 A In the weeks leading up to election day, at that point, you know, it was  
12 obviously an all-hands-on-deck-type of situation, so Madison and I were sent to just  
13 basically help out other offices. One of the offices we helped out was the election day  
14 operations team in, you know, making phone calls to deploy volunteers to some of the  
15 same States that I listed earlier, really just -- that's all I have to say.

16 Q Okay. Was the election day operations team focused on all of those  
17 battleground States or a nationwide effort?

18 A I would say mostly focused on those States. I'm not entirely sure, you  
19 know, what their efforts were beyond those States.

20 Q Okay. And the EDO team or office, was that also at the Arlington  
21 headquarters?

22 A That's correct.

23 Q Okay. And who did you report to for your work in the support role for the  
24 EDO?

25 A That would be the deputy director of election day operations, Michael

1 Brown.

2 Q Okay.

3 At some point during the election, did you -- did you focus on the Georgia  
4 election? Let me rephrase.

5 A Yeah.

6 Q You mentioned that you became a contractor for NRSC. Is that correct?

7 A Correct.

8 Q Okay. Was that for the general election or the Georgia runoff?

9 A Solely the runoff.

10 Q The runoff. Okay. So that started after the conclusion of your work for  
11 the Trump campaign. Is that correct?

12 A My contract with the NRSC officially began on December 1st of 2020 -- 2020.

13 Q 2020, right. And how long did you work for the NRSC?

14 A I believe that contract ended on January either 15th or 30th, whatever pay  
15 period that was. I concluded work with them about 3 days after the runoff.

16 Q Three days after. Okay.

17 So, just generally, what were your responsibilities when you were working for the  
18 NRSC? Were you physically in Georgia?

19 A I was in Atlanta, Georgia.

20 Q Okay. So what were your responsibilities when you were at the NRSC in  
21 Georgia?

22 A I coordinated volunteers, you know, any volunteers that were in the  
23 building. I was still working with Ms. Crawley. We would, you know, order lunches for  
24 catering, things like, you know, letting volunteers know what day to arrive, letting them  
25 know where their hotel accommodations were, really just tasks similar to that -- you



1 know, restocking office supplies. Yeah.

2 Q Okay. And who did you report to when you were working with the NRSC?

3 A Sorry, there were a lot of people in the office. Michael Brown, who I  
4 mentioned, was there. Mike Roman was there. And I'm not sure -- since we were all  
5 contractors, you know, none of us had official titles, so I'm sorry that I'm leaving those  
6 out. And Alyssa Specht was also there.

7 Q How do you spell Alyssa's name?

8 A I believe it is A-l-y-s-s-a. "Specht" is S-p-e-c-h-t? I think so.

9 Q That works for me. Yeah, I just wanted to make sure --

10 A Sorry. That's just a guess.

11 Q Yeah -- if you knew it, wanted to make sure we had it, you know, clear in the  
12 record.

13 Okay. I believe you mentioned that you had worked -- you had reported up to  
14 Michael Brown during the Trump -- when you were working for the Trump campaign. Is  
15 that correct?

16 A For a brief period of time.

17 Q Right. And what about Mike Roman you mentioned? Was that  
18 somebody that you worked with on the Trump campaign?

19 A Not directly. More so through communications with Mr. Brown.

20 Q Okay. And same question for Alyssa Specht. Is that also someone that  
21 you had worked with in the Trump campaign?

22 A No, I had not worked with Alyssa. I met her when I was in Georgia, I  
23 believe.

24 Q Okay.

25 And then you mentioned that you're currently working for a company called First

1 Tuesday Strategies. Is that correct?

2 A That's correct.

3 Q What's your title there?

4 A Public affairs associate.

5 Q Okay. And approximately when did you start that job?

6 A April 2021.

7 Q Okay. And, just generally, what are your responsibilities in your current  
8 job?

9 A Just working with clients to -- mostly public affairs clients -- sorry -- to, you  
10 know, send them materials for -- we do PR. We -- you know, any messaging or talking  
11 points where we're acting as general consultants on a project, things like that.

12 Q Okay. That's great. Thank you.

13 [REDACTED] I just wanted to clarify, about when did you say you started  
14 working for the Trump campaign?

15 The Witness. It would be --

16 [REDACTED] Approximate is fine.

17 The Witness. Yeah. Either the second half of May of 2020 to early June. I  
18 don't have an exact date.

19 [REDACTED] That's fine. Thanks.

20 The Witness. Uh-huh.

21 [REDACTED] That's it.

22 BY [REDACTED]

23 Q Okay. We have the subpoena in your binder there in front of you marked  
24 as exhibit 1, if you need to refer to it at any time.

25 And you understand that you're appearing here pursuant to the subpoena that

1 was issued to you dated November 8, 2021. Do you understand that?

2 A Yes.

3 Q Okay. We know that you have produced documents in response to the  
4 subpoena. I have a couple of questions for you just about generally how those  
5 documents were collected, and then we'll talk about the documents in a few minutes as  
6 well.

7 So did you review the schedule of requests that were attached to your subpoena?

8 A Yes.

9 Q Okay. Did you search for records that were responsive to the subpoena  
10 schedule?

11 A Yes.

12 Q Okay. And have you produced to the select committee all documents or  
13 communications in your possession, custody, or control that are responsive to those  
14 requests in the schedule to the subpoena?

15 A Yes.

16 Q Okay. So where did you -- what generally can you tell us about the places  
17 that you searched for documents responsive to the subpoena?

18 A Yeah. I searched my personal cell phone, text messages, things like that,  
19 personal email account through Gmail, and, related to that, anything that was shared  
20 with me in some kind of Google Drive format.

21 I'd like to go ahead and state that there were a lot of things that were shared with  
22 me that, you know, I don't know who shared them, things like that, you know, things that  
23 I had access to but had really never seen. Of course, if it was responsive, it was sent.

24 And, let's see, my personal computer and -- yeah.

25 Q Okay. Just for clarification, when you said that you had access to

1 documents but that you had not seen them, does that mean, when you went through the  
2 process of searching documents to find things responsive to the subpoena, you then saw  
3 documents that you determined to be responsive but that you had not known that you  
4 had before that point?

5 A Yes.

6 Q Is that an accurate understanding of what you just said? Okay. It would  
7 be helpful for us -- we will discuss -- as we go through the documents, it will be helpful for  
8 you to identify what those documents might be, which I assume your lawyer is prepared  
9 to do.

10 A Yes.

11 Q Okay. Great.

12 So you mentioned searching all of those personal locations. Thank you for  
13 describing them.

14 Generally speaking, when you were working on the Trump campaign as the  
15 elected officials outreach coordinator -- that's the point of your professional background,  
16 your service in the Trump campaign that we're going to be focusing on today and for  
17 which you produced responsive documents. During that time period, can you generally  
18 tell us what types of computers or devices you used in the course of your duties?

19 A Yes. I did not have a campaign cell phone, but I did have a campaign  
20 laptop.

21 Q Okay. So I assume you did use a cell phone to do your job.

22 A Just my own personal --

23 Q Right, you --

24 A -- cell phone was used.

25 Q -- used your personal one. Okay. Is that the same phone that you have

1 now, the one that you used during your duties?

2 A No.

3 Q Okay. When you -- I assume that means that you replaced the phone that  
4 you had at the time that you were working on the Trump campaign?

5 A Yes. I would've had -- technically, I guess it would've been four different  
6 iPhones during this time period.

7 Q Got it. Were they -- did you have four phones at the same time or --

8 A No. No, no, no.

9 Q -- consecutively you have gone through a lifecycle of four phones?

10 A Meaning that four phones have had a lifecycle since I started on the  
11 campaign.

12 Q Got it. When you were working on the campaign, did you only have one  
13 phone at that time?

14 A At each given time, I only had one phone.

15 Q Okay. Great. Got it. As you replaced the phone, did your documents  
16 and information on that phone transfer, such that you would still have access to the data  
17 that would've been on your phone, the one that you had during the campaign?

18 A I believe that everything I had was kept through iCloud and transferred onto  
19 my phone. You know, everything -- text messages I had dated back to all the way into  
20 2020, so --

21 Q Okay. Thank you.

22 As you went through the process of looking for responsive material on your  
23 current phone, was there anything that you recalled, like a text message or anything like  
24 that, you recalled from the time period that you were working on the Trump campaign  
25 that you weren't able to locate on your current device?

1 A I don't believe so.

2 Q Okay.

3 Okay. So you mentioned that you used your personal phone to complete your  
4 work when you were elected officials outreach coordinator. Did you use any particular  
5 communication apps or anything on that phone?

6 And I'm not asking generally did you use apps to communicate with anyone. Just  
7 specifically to do your job when you were working as elected officials outreach  
8 coordinator, did you communicate for work through any other messaging apps other than  
9 the standard phone?

10 A I mean, email, text messages, the physical phone, and Wickr.

11 Q Wickr? Okay. Did you use Signal?

12 A I had the Signal app on my phone. I don't recall ever using it for  
13 work-related --

14 Q For work. Okay.

15 A I don't recall using that one, but I do have that app.

16 Q Okay.

17 A And Google, Google Voice. I believe that's it.

18 Q Okay. Any other apps, like WhatsApp --

19 A No.

20 Q -- Snapchat, anything like that?

21 A No, not WhatsApp. Snapchat would be for personal use.

22 Q Okay. Great.

23 And you mentioned that you had a campaign computer. Is that correct?

24 A That's correct.

25 Q Okay. And did you also use your personal computer for work reasons

1 during the time period?

2 A I'm sorry. Could you say the question again?

3 Q Sure. In addition to the campaign computer that you were issued, did you  
4 also use your personal computer for work-related responsibilities?

5 A Yes.

6 Q Did you search that computer for responsive materials?

7 A Which computer?

8 Q The personal one.

9 A Yes, I searched the personal one.

10 Q Okay. Great. Do you still have the campaign-issued computer?

11 A It's in my possession, yes.

12 Q Okay. And did you search the campaign-issued computer for responsive  
13 materials?

14 A I don't believe I still have access to that computer. It has administrative  
15 locks on it, and I've been locked out of my email account, which is associated with how to  
16 unlock the computer. So, you know, since my campaign email account doesn't work,  
17 the computer physically will turn on but it's not, you know -- I don't know what's on it.

18 Q Okay. I think I heard you say that you don't believe that you have access to  
19 it. Did you attempt to gain access in order to search it for responsive materials?

20 A I have not tried to gain access to the computer since April.

21 Q Okay. And why not?

22 A Because it was locked then and I assume it's still locked.

23 Q Okay.

24 A It's currently at my parents' house, and I don't live there.

25 Q And how is it that you still have the computer in your possession?

1           A     Right. Well, since I went to work for the NRSC directly after leaving the  
2 campaign, there was no time to turn in the computer. I mean, it just kind of came with  
3 me, and now it just collects dust in a closet, so --

4           Q     Okay. Got it.

5           [REDACTED] Do you have anything on this computer point?

6           [REDACTED] No, not at this time.

7           [REDACTED] Okay.

8

BY [REDACTED]

9           Q     You mentioned that you used your campaign email address that you no  
10 longer have access to. Did you also use any other email accounts to conduct your  
11 business as elected officials outreach coordinator?

12          A     It would've just been my personal email address through Gmail, which  
13 would've connected to, you know, shared documents and stuff through Google Sheets  
14 and things like that.

15          Q     Okay. And did you search your personal Gmail account for documents  
16 responsive to the subpoena?

17          A     I did. My Gmail, you know, actual email and everything on the drive as  
18 well.

19          Q     Okay.

20                 Did you use any social media apps in the course of your work as elected officials  
21 outreach coordinator?

22          A     I guess Twitter to just look and see if things such as op-eds or interviews that  
23 elected officials had done had been published. Probably the same for Facebook as well.

24                 Oh, and we did -- sorry, forgot this part. We -- Madison and myself, if there was  
25 ever an elected official who was interested in working with us, we would run a quick,



1 informal vetting process where we would just scroll through their social media to, you  
2 know, make sure that there wasn't anything offensive or inappropriate posted on there  
3 before we worked with them.

4 Q Got it. It sounds like these were resources that you used primarily for  
5 research. Is that accurate?

6 A In regards to work, yes.

7 Q Yes. In your work responsibilities, did you use either Twitter or Facebook  
8 as a communications app to communicate --

9 A No.

10 Q -- related to your job?

11 And did you search your Twitter and Facebook for any material responsive to the  
12 subpoena?

13 A No. I never conducted any work besides searching someone's name in the  
14 search bar on Facebook and scrolling through their Facebook account.

15 Q Okay.

16 A No communications of any kind through any of those networks.

17 Q Got it.

18 I forgot one social media. Did you use Instagram as a communications app in the  
19 course of your work as elected officials outreach coordinator?

20 A Not work -- no, I didn't use any social media apps for communication  
21 whatsoever.

22 Q Great. Okay.

23 [REDACTED] Anything on documents?

24 [REDACTED] So no DMs, direct messages, on, like, Twitter or Instagram that  
25 would've been related to your work?

1           The Witness.   No, not that I can remember.

2           [REDACTED]   Okay.

3           BY [REDACTED]

4           Q   Okay.   So we're going to switch gears and talk a little bit about your work  
5           during the 2020 election.   So, again, we're going to focus on your job as elected officials  
6           outreach coordinator, that time period in your professional career.

7           So can you tell us a little bit more about what your role was with respect to the  
8           elected officials, your outreach role --

9           A   Uh-huh.

10          Q   -- during the time period from when you started with the campaign through  
11          when you transitioned to the EDO support role?

12          A   Are you asking up until the point --

13          Q   Yes.

14          A   -- where I transitioned?

15          Q   Yes.

16          A   I never communicated directly with any elected officials.   My main goal  
17          was, you know, more statistics.

18          I would say, you know, this manager talked to X number of Representatives in  
19          Georgia.   Here are the things that people in Georgia -- I'm just using Georgia as an  
20          example of a State.   You know, here's what they're saying people in their district or their  
21          county care about.   Or, you know, this Representative in this particular State had a radio  
22          interview; you know, here's a clip of that radio interview.

23          And these would just be things I would put into reports or track on, you know, a  
24          spreadsheet or something like that.

25          Q   Okay.   Great.   And those managers that you're referring to, is that Olivia

1 Miller and Nicholas Ivory?

2 A Correct.

3 Q Okay. Were there other managers of the elected officials outreach -- in the  
4 elected officials outreach role for the campaign in addition to Olivia and Nicholas?

5 A No, not in the managerial role. Basically, our team of four -- Nicholas Ivory,  
6 Olivia Miller, Madison Crawley, and myself -- all reported to Jim O'Connell, the political  
7 director.

8 Q Okay.

9 So did you have any involvement in the development of a communications  
10 strategy for outreach to elected officials?

11 A Not in strategy, no. My main goal was just keeping track of what people  
12 were saying. And, you know, if someone -- another thing we did in the office is, if they  
13 talked to someone who, you know, say, was a female Representative and they wanted to  
14 be involved in the coalition Women for Trump, we would collect and, you know, forward  
15 their information along to the coalitions department.

16 Q Okay.

17 Did you have any discussions within your team on the elected officials outreach  
18 operation about election security or election integrity?

19 A Can you clarify the question?

20 Q Sure. So, within your team of four that you just described who were  
21 focused on elected officials outreach in the time period before election day 2020, did you  
22 have communications within your team about election security issues?

23 A No.

24 Q No. Okay. Was election security or election integrity issues something  
25 that was discussed with elected officials?

1           A    No.

2           Q    Okay.

3           A    But if, you know, you wanted specifics on those calls with those people,  
4   you'd have to ask Olivia Miller or Nick Ivory on what they were saying.  You know, I  
5   wasn't involved in those calls, I wasn't keyed in.

6           Q    Got it.  But to the extent that your role was to collect information about  
7   what their calls were --

8           A    Correct, I never saw anything about election integrity or anything related to  
9   that.

10          Q    Okay.  Great.

11               And, within the Trump campaign headquarters in Arlington, were you aware of  
12   any communications about election fraud issues before November 3, 2020?

13          A    Can you repeat the question?

14          Q    Sure.  You were working at the Arlington headquarters during this time  
15   period.  Is that right?

16          A    Correct.

17          Q    Okay.  Outside of your team of four with other officials working -- you  
18   know, other campaign staff members, are you aware of any communications about  
19   election fraud or election integrity issues before November 3rd?

20          A    Not any conversations that directly involved me.  However, the office of  
21   election day operations, that's part of what they handle.  So --

22          Q    Okay.

23               Okay.  Before you transitioned into the role of supporting the EDO team within  
24   elected officials outreach, is there a specific communications plan about the election?

25          A    I'm sorry?

1           Q    Let me rephrase that question.   In this elected officials outreach team of  
2   four that you described --

3           A    Uh-huh.

4           Q    -- how does that -- how did the work change as you approached the election,  
5   as you got closer to November 3rd?

6           A    Right.   As we got closer to November 3rd, there was obviously not as much  
7   time for elected officials to, you know, get op-eds published in local newspapers and  
8   things like that.   And, you know, at that point, there was really no messaging points to  
9   collect that could be, you know, ever used.   Obviously, that's a quick turnaround.

10          So, as things got closer, it got more so in inviting them to events.   Not myself,  
11   particularly, but the managers would, you know, extend invitations to them to attend  
12   rallies or events with members of the First Family or whoever was campaigning on behalf  
13   of the Trump campaign.

14          So that was the biggest shift, and more so less to do with tracking, and more so  
15   tracking event attendance.

16          Q    Okay.

17          Okay.   Before election day, did you or anyone on your team of four have any  
18   discussions with elected officials about the possibility of alternate slates of electors?

19          A    No.

20          Q    Okay.   Had you ever heard of that concept before?

21          A    No.

22          Q    What about, more generally, any discussions that you had or that you know  
23   about with elected officials about their constitutional role in certifying the election?

24          A    And what time period are you referring to?

25          Q    Before November 3rd.

1 A No.

2 Q Okay. And did you have any knowledge of what the constitutional role of  
3 State legislatures might be before November 3rd?

4 A No.

5 Q Okay.

6 Okay. Outside of your team of four that you've described to us, were there  
7 other components of the Trump campaign that also had a responsibility in  
8 communicating with elected officials?

9 A The only office that comes to mind would be coalitions. Really, any of  
10 those coalitions, such as Latinos for Trump or Women for Trump or anything related to  
11 that office, I would assume that they would talk to elected officials.

12 I'm not aware of any other offices that would be communicating with them. But,  
13 of course, you know, in general, our general comms team or things like that, you know,  
14 press, all those people could be communicating with them, but --

15 Q Okay.

16 A -- coalitions is the only one I'm fully aware of.

17 Q Okay.

18 Before November 3rd, are you aware of any discussions or communications with  
19 those teams about election fraud or election integrity issues?

20 A No.

21 Q And same question for any communications before November 3rd with  
22 those teams about the constitutional role of State legislatures?

23 A No.

24 Q Okay. Great.

25 Before November 3rd, did you have any role in election-related litigation?

1           A     There, at one point -- I'm not sure exactly what, you know, official office it  
2     was for, but there were binders for election night for specific States that just really  
3     highlighted, you know, State election laws, statutes, things like that.   And my only job  
4     with that was just printing them and hole-punching them and putting in the binder.   So  
5     that was really the only litigation-related thing that I did.

6           Q     Okay.   And was that in your role as elected officials outreach coordinator or  
7     once you were supporting the EDO team?

8           A     I mean, that was just a general -- someone said, "Hey, can you help us  
9     print?" and I said, "Sure," you know?   There's just not any, really, structure when  
10    everyone's, you know, all hands on deck at that point.

11          Q     Got it.   Do you know who was responsible for preparing those  
12    binders -- the materials that went into them, that is?

13          A     I would assume the legal team.   I don't really have any specific names.

14          Q     Okay.   Did you have any direct interaction with anyone on the legal team  
15    for the campaign around this time period?

16          A     One of my friends on the campaign was Sadie May, and she was the  
17    executive assistant for --

18               [Alarm sounding.]

19          A     -- one of the attorneys.

20               [REDACTED]   Let's pause for 1 second and go off the record so we can figure out  
21    what that alarm sound is.

22               The Witness.   Okay.

23               [REDACTED]   We'll go off the record now.

24               [Recess.]

1

2 [11:11 a.m.]

3 [REDACTED] Okay. So hopefully we can proceed.

4 Mr. Brothers. Yes.

5

BY [REDACTED]

6 Q Yeah, okay. Great. Okay.

7 Ms. McCallum, we were discussing your work pre-election day --

8 A Correct.

9 Q -- before our short break. Now can we talk about how your role changed in  
10 the time immediately before and on election day? I believe you mentioned earlier that  
11 you transitioned to a role supporting the EDO, the Election Day Operations Team. Is  
12 that correct?

13 A Not, you know, any kind of official job change or anything like that, but just  
14 as a supportive role.

15 Q Okay. Great. And I believe you said earlier that in that supportive role for  
16 the EDO team you were working for the deputy director, Michael Brown. Is that  
17 correct?

18 A Correct.

19 Q Okay. And I believe you also said earlier that through Mr. Brown you -- he  
20 reported up to Mike Roman. Is that correct?

21 A Correct.

22 Q Okay. Just generally, can you tell us what the EDO team, what their  
23 responsibilities were for the election?

24 A I can't, you know, speak on everything that they did. Really, the only thing  
25 that I was directly involved in was deploying volunteers, just regular volunteers, and also



1 lawyers to battleground States to help out on election day and the week before and after.

2 Q Okay. And approximately how far in advance of election day did you start  
3 working with the EDO team?

4 A Maybe a couple weeks. Not very long.

5 Q Okay. And what if anything was different about the responsibilities of the  
6 EDO team on election day itself, November 3rd?

7 A I was not with the team on election day.

8 Q Okay. Where were you on election day?

9 A Campaign headquarters in Arlington.

10 Q Okay. And what were your duties or responsibilities on election day itself?

11 A Not much. I got there probably around 8 or 9 o'clock in the morning.

12 Basically, the President -- or President Trump came to visit the campaign headquarters, so  
13 it was a lot of sitting around, security, before, after, really just chatting, went out, got  
14 lunch, came back, sat around some more.

15 Then, on election night, once the polls started closing, my only responsibility was  
16 to try and figure out what news organization called which State first. And I would just  
17 plug it in with a link to a tweet from Decision Desk or something like that into a  
18 spreadsheet.

19 Q Okay. And what do you remember about how that election night  
20 proceeded following the polls closing?

21 A Not much. Madison and myself were the only ones -- really the only  
22 people we directly worked with from EDO or the political department, the elected  
23 officials outreach office. Madison and I were the only ones present from either of those  
24 offices that I remember. So, I mean, there really wasn't much going on.

25 Q All right. So you're watching the -- each of the networks to determine

1       when --

2           A     Essentially getting paid to watch the news.

3           Q     Right.

4           A     Really nothing beyond that.

5           Q     Right.

6           A     That's all we did.

7           Q     Did you have an expectation of how late you would have to be watching the  
8       news to determine when States were called?

9           A     No.   It was kind of an ambiguous, watch the news --

10          Q     Right.

11          A     So --

12          Q     Did you stay at election headquarters very late that night?

13          A     Probably until around 3 in the morning.

14          Q     And just generally, what was the mood at election headquarters during the  
15       day and into the night of election night?

16          A     Fine, you know, excitement that it was election day.   Really nothing beyond  
17       that.

18          Q     Who asked you to monitor the networks and the time at which they called  
19       each State?

20          A     Jim O'Connell's assistant, Danna Almeida.

21          Q     Could you spell that name for the court reporter?

22          A     D-a-n-n-a.   Almeida is A-l-m-e-i-d-a?   I'm not entirely sure of the spelling  
23       of the last name.

24          Q     That's still helpful.   Thank you.

25               And when you were asked to watch the networks and determine when they called

1 each State, was there any instruction given to you about how late that process might go?

2 A No.

3 Q Okay.

4 So you said you stayed at headquarters until almost 3 a.m., November 4th.

5 A Yes.

6 Q Very early the next day. What was the point at which you determined  
7 that your responsibilities of watching for the networks to call the elections in the various  
8 States were over?

9 A There weren't as many States being called, you know. It was basically like  
10 a, "Hey, we're thinking of going" -- you know, "we," being myself and Madison -- "Hey,  
11 we're thinking about going home. Is that okay?" I mean, it was not a structured job  
12 task, so --

13 Q Okay. Got it.

14 Within the election night -- sorry. Strike that.

15 Within the Trump campaign headquarters in Arlington on election night, was  
16 there any surprise when certain States were called?

17 A No specific incidences that I recall.

18 Q Okay. And before election day, November 3rd, what was your expectation  
19 about how long you would continue to be employed by the Trump campaign?

20 A I believe most people, low level like myself, their contracts ended either the  
21 15th or the 30th, you know. No one -- no one really had time to talk about anything  
22 after election day prior to election day, so there was no expectation really.

23 Q Okay. And you mentioned contracts. Is that because most of your  
24 colleagues on the campaign had a defined contract rather than just being sort of an  
25 at-will employee of the campaign?

1 A Sorry, can you clarify?

2 Q Sure. Yeah, I guess I'm just trying to understand better, are you using the  
3 term "contract" because there was an actual contract that was written that prescribed  
4 the terms of your employment and set a specific end date to your employment?

5 A Yes, I'm talking about people who were on payroll. Is that more clear for  
6 you?

7 Q Yes. I guess, I'm wondering whether it was just on payroll as staff such that  
8 you could be let go at any time, or whether you were actually a contractor of the  
9 campaign that had a defined term of employment that ended on a specific date.

10 Mr. Brothers. So just for clarification, and I guess to avoid speculation, is your  
11 question whether Ms. McCallum had a contract?

12 [REDACTED] Yes.

13 Mr. Brothers. Okay.

14 So, yeah, did you have a contract with the Trump campaign for your work, you  
15 know, pre-election day?

16 The Witness. Yes, I signed, like, an employee contract, and after that I was put  
17 on payroll. And I believe somewhere in the contract said that the last payday would be  
18 the 15th or 30th or something like that. You know, I'm not entirely sure how that  
19 looked for other people, and I don't have a clear memory on what exactly it was for me.

20 BY [REDACTED]

21 Q Got it. Thank you for that clarification, Mr. Brothers. That helped.

22 So did you sign that contract of employment by the campaign before you started  
23 working there in approximately March 2020?

24 A I believe so. I don't have access to any of those employment documents  
25 anymore, so --

1 Q Okay. So did you keep a copy of your employment contract when you were  
2 working on the campaign?

3 A It was in a cloud, but there's no -- it's not there.

4 Q So you no longer have access to that document?

5 A I had access through DocuSign, and I no longer have access via DocuSign, so I  
6 don't know exactly what the employee contract said.

7 Q Okay. Okay. Thank you.

8 [REDACTED] I just want to clarify. When did you say your Trump campaign  
9 work began? Was it March or April of 2020 or May?

10 The Witness. It was sometime in May or June of 2020.

11 [REDACTED] Okay. That was my mistake. I was recalling the time that your  
12 internship ended.

13 [REDACTED] Okay. Thanks. Clarifying for the record.

14 The Witness. Sorry.

15 [REDACTED] Yeah, no, not a problem.

16 [REDACTED] Okay. Anything you have to follow up on that?

17 [REDACTED] No.

18 [REDACTED] Okay.

19 BY [REDACTED]

20 Q Ms. McCallum, at some point after -- well, actually, let me rephrase.

21 So after election day that went into early morning the following day, how did your  
22 job responsibilities change?

23 A After I left, around 3 a.m. on the 4th, like I mentioned, I came back around 9  
24 on the 4th and really just kind of, you know, sat there waiting for someone to tell me  
25 what to do.

1 Q And did someone come tell you what to do?

2 A Yes. I was -- I believe I was informed sometime that afternoon or evening  
3 that I was wanted to go help in Pittsburgh, Pennsylvania.

4 Q Okay. Did you go to Pittsburgh, Pennsylvania?

5 A I did.

6 Q Okay. When did you go?

7 A I believe on the 5th, potentially the 6th.

8 Q Okay. And approximately how long were you in Pittsburgh?

9 A About a week.

10 Q About a week, okay. And maybe we'll come back and talk a little bit more  
11 specifics about what you did, but maybe it would be helpful at the beginning just to get a  
12 bit of a high-level overview of where you went from that time after election day until you  
13 started working on the Georgia runoff.

14 A Okay.

15 Q So I think what I'd like to do now is just run through that just from a timing  
16 and location perspective, and then we come back and talk a little bit more specific about  
17 what you were doing around that time.

18 A Okay.

19 Q Does that work?

20 A Uh-huh.

21 Q Okay. So after election day, so for the time period that we're talking about,  
22 you know, November 4th through -- [REDACTED] may be able to keep me honest -- but the  
23 time that you started working for the NRSC and were focused on the Georgia runoff  
24 elections, can you walk us through where you physically were during that time period for  
25 your job responsibilities?

1           A     Okay. When I left for Pittsburgh, around the 5th of November, I was there  
2     for approximately a week. I came home for one day, maybe 24 hours, to McLean,  
3     Virginia. And after leaving McLean I went to Philadelphia and stayed there until, I want  
4     to say, one of the first days in December, the 4th comes to mind, either the 4th or the  
5     5th.

6           And at that point, I drove back to South Carolina, went to my parents' house for  
7     maybe 2 days, and then Atlanta, Georgia, to start with the National Republican Senatorial  
8     Committee.

9           Q     Okay. So based on what you told us earlier in that very helpful overview, is  
10    it accurate to say that from election day until you went to South Carolina and visited your  
11    parents, before going to Atlanta, you were still employed by the Trump campaign. Is  
12    that right?

13          A     Through -- partially I was still on payroll until either the 15th or the 30th. I  
14    don't remember entirely. And then at some point during November that switched to an  
15    independent contractor role, filing, I believe it's called an I9 or something like that -- or  
16    1099.

17          Q     Okay. So you became a 1099 employee after you went off the Trump  
18    campaign payroll?

19          A     Yes. It was referred to as a 1099 contractor.

20          Q     Okay. And that -- did that end when you started working for the NRSC?

21          A     That contract was originally, I believe, went through the 15th of January. It  
22    was just, you know, while I was being paid through the 15th of January I was not  
23    performing work during a lot of that period, so --

24          Q     I see. Am I understanding you correctly that your job working for -- as a  
25    1099 contractor, that was still your employment circumstances when you went to work

1 for the NRSC when you were supporting efforts in Georgia? Is that correct?

2 A The independent contractor contract was from sometime in November  
3 of 2020 to sometime in January of 2021.

4 Q Okay. And I just want to note that we've been joined by Representative  
5 Aguilar.

6 So, Ms. McCallum, you were a 1099 contractor during this time. To whom were  
7 you a contractor? Who were you employed by?

8 A Contracted with the Trump campaign, Donald J. Trump for President,  
9 Incorporated.

10 Q Okay. So your employment status changed but your employer did not  
11 change. Is that correct?

12 A Correct.

13 Q Okay.

14 A Noting, at the same time, I was also a 1099 contractor with the National  
15 Republican Senatorial Committee, December and January.

16 Q Okay. And when did the 1099 contractor employment begin for the NRSC?

17 A It was dated January -- or, I'm sorry. Let me start over. It was dated  
18 December 1st, and I went to Georgia, you know, sometime before December 10th. It  
19 was very early in December.

20 [REDACTED]. Okay. Thank you. That is a very helpful overview.

21 Any questions, Alejandra, about that?

22 [REDACTED] No.

23 BY [REDACTED]

24 Q Okay. So let's go back to the day after the election when you were asked  
25 to go to Pittsburgh.



1           Who asked you to go to Pittsburgh?

2           A    I believe it was Michael Brown.

3           Q    Okay.  And what were you asked to do there?

4           A    I was told to report to Christina Norton.  Pretty vague on, you know, what  
5 exactly that would look like at that point.

6           Q    Okay.  And what was -- was Christina Norton an employee of the Trump  
7 campaign?

8           A    Not to my knowledge.  She is the political director at the Republican  
9 National Lawyers Association.  Just, you know, assisting the campaign.  I don't know if  
10 she had a formal contract.

11          Q    Got it.  And what was your understanding at the outset of what you  
12 were -- what your responsibilities would be once you reported to Ms. Norton?

13          A    At that point, I just knew that I'd be assisting her.  I didn't know what that  
14 looked like.

15          Q    Okay.  So once you got to Pittsburgh, how did your responsibilities -- what  
16 were your responsibilities once you got there and found out -- found them out?

17          A    Right.  So I drove up there with Christina, checked into the hotel, went to  
18 the office building that whoever was working in Pittsburgh for the Trump campaign was  
19 at.

20               Christina and I get there.  They basically say that they need help with provisional  
21 ballot review and canvassing.  So Christina and I, you know, coordinate volunteers to  
22 make sure counties had observers there.

23          Q    Okay.  And I think you told us that you were in Pittsburgh for about a  
24 week following the election?

25          A    That's correct.

1           Q    Is that right?   Okay.   And was there anything else in addition to what you  
2   just described to us that you worked on in Pittsburgh?

3           A    I believe everything I did in Pittsburgh was related to provisional ballot  
4   canvassing.

5           Q    Okay.   So just generally, what did that look like, provisional ballot  
6   canvassing?

7           A    I'm not entirely sure.   I don't really know what a provisional ballot is.   I do  
8   know that, for some reason, that they are not counted with regular ballots.   They have  
9   to be reviewed, I assume, by the county board of elections.   And then there are  
10   observers from each party there representing, you know, a Republican candidate or a  
11   Democratic candidate.   And those are reviewed by the board and then either included in  
12   the vote count or thrown out for various reasons.

13          Q    Okay.

14          A    So --

15          Q    Did you -- sorry.   I didn't mean to cut you off.

16          A    I don't have anything else on that question.

17          Q    Did you have any interaction with local elected officials while you were in  
18   Pittsburgh?

19          A    No.   The only person who I interacted with who I believe ever held office  
20   was a former State representative in Pennsylvania.   I believe his name is Keith Rothfus.  
21   I don't have any idea what the spelling of that is, so --

22          Q    Okay.   No problem.

23          A    But he was not currently in office.   He was a former Congressman.

24          Q    Okay.

25          A    I believe his role was just assisting the campaign, so --

1 Q Did you have any interaction with -- or, sorry, let me rephrase.

2 While you were in Pittsburgh supporting Ms. Norton from the Republican National  
3 Lawyers Association, did you do any work related to election fraud?

4 A No. I believe the provisional ballots aren't necessarily fraud related. I  
5 think things like they submitted an -- a voter submitted an absentee ballot but there was  
6 no secrecy envelope or something like that. So no, like, fraud incidents.

7 Q Okay. Understood. And where physically were you working in  
8 Pittsburgh?

9 A So the first day or 2 days I was there we were working out of an office  
10 building. I believe it was just a law office building. I don't know which one. The  
11 building had started to receive, you know, threats based on the fact that people in the  
12 public knew that people from the Trump campaign were working there. And so  
13 Christina and I just worked out of our hotel room for the rest of the time we were in  
14 Pittsburgh.

15 [REDACTED] Okay.

16 Do you have anything else about Pittsburgh?

17

BY [REDACTED]

18 Q Did you help at all with affidavits or collecting declarations or anything like  
19 that in Pittsburgh as part of your responsibilities?

20 A Can you repeat the question?

21 Q Yep. Did you help with collecting affidavits or declarations during your  
22 time in Pittsburgh?

23 A No.

24 Q Okay.

25

BY [REDACTED]

1           Q    Okay.  And I think you told us that after about a week you came home here  
2   to Virginia.

3           A    Uh-huh.

4           Q    Is that correct?  What was your understanding then about any additional  
5   duties that you would have for the Trump campaign?

6           A    I came back to Virginia, McLean, with the understanding that I would likely  
7   be going to Philadelphia.  I didn't have at that point any idea of when or what I'd be  
8   doing there.  I was still -- the provisional ballot canvassing in Pennsylvania was not over  
9   at that point, so I was still working with Christina.

10          Q    Okay.  So the provisional ballot canvassing work that you were doing in  
11   Pittsburgh, was that specific to Pittsburgh or for all of the State of Pennsylvania?

12          A    I don't have a comprehensive list of counties that Christina and I were  
13   responsible for.  I do know it was pretty much most of the counties.  I say most as kind  
14   of a guess.  I'm not really sure.

15                I don't know much about Pennsylvania, you know, how many counties are there  
16   or anything.  I think it was pretty much everywhere but Philadelphia and maybe some of  
17   those surrounding counties we did not handle either.  This is also over a year ago, so my  
18   knowledge of Pennsylvania counties is low.

19          Q    I appreciate that.  Thank you.

20                So when were you told to go to Philadelphia?

21          A    At some point within that 24 hours that I was home, so some day a week  
22   after the election.

23          Q    A short visit, unpack, repack?

24          A    Yes.

25          Q    Off you go.  Okay.

1           So who told you to go to Philadelphia?

2           A     Deputy Director Michael Brown.

3           Q     Okay. And what did Mr. Brown tell you were your -- would be your  
4 responsibilities in Philadelphia?

5           A     Well, I was still working with Christina at the time, so finishing up provisional  
6 ballot canvassing, you know, work with her. She would -- I was also informed that she  
7 would also be going to Philadelphia.

8           Q     Okay. And did she go to Philadelphia, Ms. Norton?

9           A     She did.

10          Q     Okay. After the -- did you have an expectation at the time of what else you  
11 would be asked to do beyond the provisional ballot canvass once that was complete?

12          A     Not at that time, no.

13          Q     Okay. What happened when you got to Philadelphia?

14          A     I continued to work on things related to provisional ballot review. My  
15 friend and colleague, Madison Crawley, was still there, you know, helped her out with  
16 some tasks she was doing, basically just managing the volunteers who were in the  
17 Philadelphia office.

18                She would organize things like catering and, you know, making sure  
19 everything -- everyone had office supplies and things like that. So I would just assist her  
20 with a couple of those things.

21          Q     Okay. And Madison, did she go to Philadelphia before you did?

22          A     She was already there when I got there.

23          Q     Okay. Had she gone there right after the election?

24          A     I'm not entirely sure of her -- of the date that she left Arlington, but I believe  
25 it was around the same time that I went to Pittsburgh.

1 Q Okay. How long did you stay in Philadelphia?

2 A I left sometime around December maybe 3rd or 4th, so --

3 Q So is that -- so you were in Pittsburgh for about a week after the election, so  
4 you got to Philadelphia maybe November 12th or 13th, somewhere around there. Does  
5 that sound right?

6 A Sorry, I'm trying to do math in my head.

7 Q Yeah.

8 A Yes.

9 Q Yeah. So was it maybe about 3 weeks or longer that you were in  
10 Philadelphia?

11 A I'm trying to do math in my head again. Yeah, that sounds about right.  
12 Just sometime, you know, mid-November to very early December.

13 Q Okay. Okay. Great.

14 Did you have any contact with local elected officials in Philadelphia while you were  
15 working for the Trump campaign there?

16 A No, none that I recall.

17 Q And did you have any role in election fraud issues in Philadelphia?

18 A Yes, but not directly. If there was an affidavit or a declaration that  
19 someone else collected, my role, like I mentioned with the Google Drive that we talked  
20 about earlier, you know, me not having -- knowing what some of those documents were,  
21 my role was basically just taking them from an unorganized folder in the drive and sorting  
22 them by county or incident or whatever it was there. So, yes, but not directly.

23 Q Okay. And who was collecting or -- the affidavits and declarations that  
24 you're referring to?

25 A I am not sure who collected them. I assumed lawyers, but I don't know

1 who or anything like that.

2 Q During this time period, towards the end of November and early December,  
3 were you involved in collecting any affidavits or declarations about election fraud?

4 A I did not collect them. Solely organizing, like I stated.

5 Q And is it right that you said that you don't know who collected them?

6 A I don't have any names of people who collected them, no. I think it was a  
7 group of lawyers, likely campaign volunteers. But, no, I have no specific names on who  
8 was collecting those.

9 Q Okay. Is there anyone in particular who asked you to organize them?

10 A Chelsea Barnett.

11 Q Okay. And was Ms. Barnett a lawyer for the campaign or a campaign  
12 staffer?

13 A She was employed by some aspect of the campaign. I believe it was Trump  
14 Victory or one of the PACs or something. And she came to Philadelphia to, you know,  
15 continue to assist the campaign. She's -- so I don't know, you know, what her official  
16 title was in Philadelphia.

17 Q Okay.

18

BY [REDACTED]

19 Q I just wanted to ask a quick followup question. I believe you said that you  
20 helped organize the affidavits or declarations that you were collected by other people.  
21 Is that right?

22 A Yes.

23 Q In Philly. Did you say that you helped sort them by county or incident?

24 A Yes.

25 Q Okay. Can you just clarify what you mean by incident?

1           A     Meaning like if the declaration was, you know, someone, I don't know, a  
2     particular type of alleged voter fraud or irregularity or something like that.

3           Q     And do you remember the types of alleged voter fraud or irregularities that  
4     you could sort by or that you were sorting by?

5           A     I mean, to be honest, I mostly did them by county and by name.   You know,  
6     they would assign a certain number to a certain person's affidavit or declaration, and I  
7     would mostly just, you know, assign the number, something like that.   I'm not really sure  
8     about, you know, the names of the folders that they were specifically sorted by beyond  
9     that.

10          Q     And do you -- did anyone ever tell you how the affidavits or the declarations  
11     were going to be used?

12          A     No.

13          Q     Okay.   So you weren't -- you just knew you needed to sort them but  
14     weren't sure how -- why you needed to sort them.

15          A     Correct.

16          Q     Is that fair?   Okay.   Thank you.

17

BY 

18          Q     Do you remember any examples of the types of allegations of election fraud  
19     were in those affidavits or declarations?

20          A     Things like people who were deceased voting or incidents of, you know, one  
21     person casting multiple ballots, incarcerated individuals.   I don't know.   That's not  
22     really a comprehensive list.   Those are just some examples.

23          Q     Okay.   Do you recall approximately how many affidavits or declarations  
24     were collected in Pennsylvania?

25          A     I don't have any clue.



1 Q Okay. Did there ever come a time where you had another responsibility  
2 related to those affidavits or declarations?

3 A I printed some of them out one time.

4 Q For whom?

5 A Michael Brown asked me to print them, but I'm not sure who asked him to  
6 print them.

7 Q Okay. Did you have any other connection with election-related litigation?

8 A No.

9 Mr. Brothers. I guess, could you clarify, like connection, like --

10 [REDACTED] Sure, I can rephrase that. Sure, yeah.

11 The Witness. Yeah, could you be more specific?

12

BY [REDACTED]

13 Q Uh-huh. Here's a first question. Those affidavits or declarations, did you  
14 ever become aware that they had been used in court, for instance?

15 A I believe that's what we were printing them for. I'm not entirely sure if  
16 they were, you know, actually presented in court or not.

17 Q Okay. And did you have any other role supporting election-related  
18 litigation on behalf of the campaign?

19 A Can I consult with my attorney?

20 Q Of course.

21 [Discussion off the record.]

22 The Witness. Okay. I am ready to answer your question.

23

BY [REDACTED]

24 Q Okay. Please, go ahead.

25 A I, at one point, by the Pennsylvania State director of election day operations,

1 James Fitzpatrick, instructed me to drive Linda Kerns. She was an attorney. I believe  
2 she represented the campaign. I drove her to Williamsport, Pennsylvania, for some kind  
3 of hearing.

4 Q Other than driving Ms. Kerns to the hearing itself, did you have any other  
5 involvement with the litigation case there?

6 A Can I refer to --

7 Q Go ahead.

8 [Discussion off the record.]

9 The Witness. No, none that I recall.

10 BY [REDACTED]

11 Q Okay. Other than Ms. Kerns, who you just mentioned, and Ms. Norton,  
12 who we discussed earlier, did you have any other interactions with lawyers for the  
13 campaign while you were in Pennsylvania?

14 A Christina Norton is not an attorney.

15 Q Oh, I'm sorry.

16 A She is the political director for the National Republican Lawyers Association.

17 Q Okay. Thank you for that clarification.

18 So other than Ms. Kerns only, did you have any other interaction with lawyers for  
19 the Trump campaign while you were in Pennsylvania?

20 A Michael Brown is an attorney. I'm not sure if James Fitzpatrick is an  
21 attorney or not.

22 There were, you know, like I mentioned, those volunteers who were collecting the  
23 affidavits and everything. They were in the same building. And, like I said, I would  
24 assist Madi in making sure that they had, you know, catering and office supplies and  
25 things like that. So no interactions, particular interactions that I remember, but, you

1 know, they were in the same building. I don't remember any other attorneys.

2 Q Okay. Michael Brown, who you just told us is an attorney, did you  
3 understand him to be acting as an attorney on behalf of the campaign, or was he working  
4 in a political role?

5 A I would say working in a political role, but you'd have to ask him.

6 Q Okay. Do you have any understanding of whether Mr. Brown was  
7 representing the Trump campaign in any election-related litigation?

8 A Could you repeat the question?

9 Q Sure. Did you have any knowledge of whether Mr. Brown was representing  
10 the campaign in litigation as an attorney?

11 A I don't believe so, but once again, you'd have to ask him.

12 Q Okay. Same question for Mr. Fitzpatrick, who I think you said might be a  
13 lawyer. Did you understand him to be acting as a lawyer for the campaign at this time?

14 A I don't believe he was, but you'd have to ask him again.

15 Q Okay. And what was your friend and colleague Ms. Crawley's  
16 responsibilities while you were in Pennsylvania?

17 A Just coordinating volunteers, you know, keeping track of who was coming in  
18 and out of the building, making sure they had food and water. And, you know, pretty  
19 much we were both low-level. Yeah.

20 Q And I think you described where you were in Pittsburgh but I neglected to  
21 ask you, where were you physically working during your time in Philadelphia?

22 A In an office building that I would assume the Pennsylvania Trump campaign  
23 had been renting or leasing or something like that.

24 Q Okay. Was it a place where there were a lot of Trump campaign staffers  
25 still working when you got there?

1           A    The only staff that I can remember off the top of my head would be Michael  
2   Brown, Madison Crawley, James Fitzpatrick, and James Fitzpatrick's deputy, Lauren  
3   Casper. I believe her first name is Lauren.

4           Q    Okay. And those campaign staffers that you just identified, had they all  
5   been at headquarters until election day?

6           A    No. The only ones who were at headquarters were myself, Madison, and  
7   Michael.

8           Q    I see. And where were Mr. Fitzpatrick and his deputy, Ms. Casper, where  
9   were they working for the Trump campaign before election day?

10          A    I believe in that same office building, but you'd have to ask them for  
11   clarification.

12          Q    Okay. So it's your understanding that they had been working in  
13   Pennsylvania on behalf of the campaign before that.

14          A    Correct.

15          Q    Is that correct? Okay. Thank you.

16          [REDACTED] Okay. This is a good point to just pause to see, Ms. Lofgren, are  
17   there any questions that you'd like to ask now?

18          Ms. Lofgren. No, I'm fine. Thank you.

19          [REDACTED] Okay.

20          Anything from you, [REDACTED]?

21          [REDACTED] No.

22          [REDACTED] Okay. So we have a few more questions I think at a general level,  
23   and then we can talk about taking a longer break in the middle here for lunch if that's  
24   something that you guys want to keep on the horizon.

25          Mr. Brothers. Yeah, let's --

1           The Witness. I just have to use the restroom soon, so --

2           [REDACTED] Yes, sure. Let's go for maybe another 10 minutes. I know we  
3 were interrupted by the alarm. Let's do another 10 minutes and take a short break, and  
4 we can talk about whether we need to take a longer break for food. Okay. Great.

5           BY [REDACTED]

6           Q Ms. McCallum, did there come a time when you were in Pennsylvania for the  
7 campaign where you were asked to make phone calls to local elected officials in  
8 Pennsylvania or elsewhere?

9           A Can you repeat the question?

10          Q Sure. Did there come a time when you were working in Pennsylvania on  
11 behalf of the Trump campaign where you were asked to make phone calls to State or  
12 local officials?

13          A Yes.

14          Q Okay. When did that happen?

15          A Sometime the very end of November.

16          Q Okay. And who asked you to make those phone calls?

17          A Michael Brown.

18          Q Okay. And what did Mr. Brown tell you about what you were being asked  
19 to do?

20          A Basically just told me over text message that this is what we would be doing  
21 and sent the script.

22          Q Okay. And what was your understanding of what Mr. Brown's role was for  
23 the campaign at that time?

24          A I believe still acting as deputy director of election day operations, but you'd  
25 have to ask him to be clarified there.

1           Q    Okay.  So to the best of your recollection, what exactly did Mr. Brown say  
2   when he asked you to make these phone calls?

3           A    Just said that we would be making phone calls over text message and then  
4   sent a basic script.

5           Q    Okay.  And this -- I know that you have produced text messages to us and  
6   we plan to talk about them, so this is not meant to be a memory test.

7           A    Okay.

8           Q    If there is something that you remember that was actually communicated to  
9   you in a text message that you produce, we can start looking at documents.

10           So my question also was directed at, did you have any other conversations with  
11   Mr. Brown, separate from the text messages that he sent and that you produced, about  
12   what you were being asked to do?

13           A    After the text messages were sent --

14           Q    Okay.

15           A    -- we met in person.

16           Q    And where did you meet?

17           A    Someone's hotel room.  I'm not exactly sure whose.

18           Q    Okay.  And who else was present?

19           A    Madison Crawley, Chelsea Barnett, and Kerrick Kuder.  Kerrick is  
20   K-e-r-r-i-c-k.  Kuder is K-u-d-e-r.

21           Q    Okay.  And tell us about what was said in that meeting in the hotel room in  
22   Philadelphia in late November where you, Mr. Brown, Ms. Crawley, Ms. Barnett, and  
23   Ms. Kuder were meeting.

24           A    It was basically repetition of the text message that we all received.  Beyond  
25   that, you know, there was a list of the representatives and senators and their contact

1 information and just an assignment of who would be calling who.

2 Q Okay. What did Mr. Brown tell you about why you were being asked to  
3 make these calls?

4 A I don't really recall. You know, I don't really recall asking either, you know.  
5 At that point I was a low-level campaign staffer and really just thought of it as another job  
6 assignment. Yeah.

7 Q Okay. Have you been asked to make calls to State or local elected officials  
8 in your job at any other time?

9 A Can you repeat the question?

10 Q Sure. Was this the first time that you'd been asked to call State and local  
11 elected officials on behalf of the Trump campaign?

12 A I believe so, yes, first time.

13 Q Okay. Do you remember if anyone in that meeting asked any questions  
14 about the assignment that you were being given?

15 A I don't remember any specific questions.

16 Q Okay. Did anyone raise any concerns about the project you were being  
17 given?

18 A I don't recall any specific concerns.

19 Q Okay. Do you recall anyone saying where the script that you were being  
20 given, where it had come from?

21 A No.

22 Q Do you know who prepared it?

23 A It was sent to me from Michael Brown. I don't know if it originated  
24 anywhere else. All I know is that I got it from him.

25 Q Got it. So is it accurate to say that Mr. Brown didn't tell you who had

1 drafted it?

2 A Correct. He did not tell me who had drafted it.

3 Q Okay. Did Mr. Brown discuss with you and your colleagues in that meeting  
4 any other issues about election fraud or election integrity?

5 A I don't recall if there was anything discussed in that meeting other than that.

6 Q Okay. And what was your understanding about this project that you were  
7 being given to call State and local officials, what was your understanding about how it fit  
8 into the current status of the campaign at that time?

9 A Honestly, I really just didn't give the job assignment much more thought  
10 than someone told me, a low-level campaign staffer, to make a phone call and I did so.  
11 You know, to me, I don't know, you know, what his idea was of how it played into the  
12 campaign.

13 Q Okay. Maybe -- you recall this meeting happening at the end of November.  
14 Is that correct?

15 A Yes, sometime in the last few days of November.

16 Q Okay. Before that meeting when you were in Philadelphia had you had any  
17 other, you know, job responsibilities or any other projects that you were given that  
18 related to the outcome of the election, like any election fraud-related work?

19 A There was at one time Michael Brown sent me an Excel spreadsheet that just  
20 had addresses on it and how many registered voters were registered at that particular  
21 address. And all I did there was just type the address into Google Maps and figure out if  
22 it was an apartment building or a hotel or whatever type of building that address was.

23 Q Okay. And what did you do with that information once you had researched  
24 it on Google Maps?

25 A Just plugged in what it was into an Excel spreadsheet and sent it back to him.



1 Q Okay. And do you recall what State those addresses were in?

2 A Pennsylvania.

3 Q That was for Pennsylvania, okay.

4 Any other projects that you've been given related to allegations of election fraud  
5 other than the affidavit sorting that we talked about and this research about addresses?

6 A Yes. On -- sometime a few days before Christmas, maybe December 23rd,  
7 Peter McGinnis, who is Mike Roman's assistant, reached out to Madison Crawley and  
8 myself about researching a list of incapacitated, I believe is the word, voters in Wisconsin  
9 and just asked us to, you know, look up these people and see if they were actually  
10 incapacitated at the time or not based on, you know, social media postings or something  
11 like that. And that information, same thing, was just plugged into, you know, a  
12 document and sent back to Peter.

13 Q Okay. And what was Mr. Roman's job title with the campaign?

14 A Director of election day operations.

15 Q Okay. And what was your understanding of his responsibilities?

16 A Overseeing election day operations.

17 Q Okay. Had you -- you mentioned that he was physically in Pennsylvania  
18 when you were there. Is that right?

19 A That's correct. I saw him a couple times while I was in Philadelphia.

20 Q Okay. And just in general, did you have any -- had you had any previous  
21 interactions with Mr. Roman before you got to Pennsylvania?

22 A I believe I met him maybe once or twice at headquarters more  
23 than -- nothing more than, you know, introduction -- "Hi, I'm Angela," "Hi, I'm  
24 Mr. Roman," you know.

25 Q Right. Okay. And did you have any other general understanding of what

1 his connection was to the campaign or his previous responsibilities, sort of where he fit?

2 A Mostly what I knew about him is he was who Michael Brown reported to.

3 Q Okay.

4 A Really nothing beyond that.

5 Q Okay. Did he work in the White House?

6 A Pardon?

7 Q Did Mr. Roman work in the White House?

8 A At one point, I believe, very early in the administration. I have no idea  
9 what his role was there.

10 Q Okay. And did you have any understanding of did he have a connection to  
11 Pennsylvania?

12 A He's from Philadelphia.

13 Q Okay.

14 A That's where he resides.

15 Q Any other understanding of what were his responsibilities in Philadelphia in  
16 this post-election period when you were there?

17 A I don't know his specific job responsibilities while he was there or before or  
18 after.

19 Q Okay.

20 [REDACTED] Okay. Yeah, go ahead.

21 BY [REDACTED]

22 Q Just a really quick followup, Ms. McCallum.

23 When you said earlier, you said you were given addresses and you were looking  
24 them up in Google and then plugging them into a spreadsheet, and Mr. Brown asked you  
25 to do that. Is that right?

1           A    That's correct.

2           Q    Do you know what Mr. Brown was going to do with that information?

3           A    I have no idea.

4           Q    And when -- I believe you said it was Mr. McGinnis, who was assistant to  
5 Mr. Roman, asked you to research what you believe might have been incapacitated  
6 voters in Wisconsin. Do you know why he needed that information?

7           A    No. He mentioned someone named Jon, J-o-n, but I don't know who Jon is,  
8 so --

9           Q    Mentioned him in the sense that --

10          A    Mentioned in the sense that I believe Peter McGinnis was sending them to  
11 Jon, whoever Jon is.

12          Q    And you believe this concerned the State of Wisconsin?

13          A    The list that I received of voters to look up were, I believe, based solely in  
14 Wisconsin.

15          Q    And do you know whether Mr. McGinnis was working in Wisconsin at the  
16 time?

17          A    I believe he was home with his family for Christmas.

18               And I also would like to clarify, I did say that Peter McGinnis was Mike Roman's  
19 assistant. I have no idea if that's, you know, his official title or not. That's just the role  
20 that I saw him acting in. I believe he was a contractor as well, but I'm not entirely sure  
21 of his employment status.

22          Q    Okay. Thank you for that clarification.

23               And when you said Mr. McGinnis, he might have been home with his family, do  
24 you know where home was for him for Christmas?

25          A    Somewhere in the Philadelphia area.

1 Q Okay. Okay. Thank you.

2

BY [REDACTED]

3 Q Okay. So just one more question and then we can take our break.

4 Going back to the meeting that you were starting to tell us about where you met  
5 with Mr. Brown with several of your colleagues in a hotel room about the project  
6 regarding calling State and local officials, had Pennsylvania been -- the Presidential race in  
7 Pennsylvania been called at that point?

8 A Sorry, could you repeat the question?

9 Q Sure. The time period that you were starting to tell us about where you  
10 met in a hotel room, Mr. Brown gave you the assignment of calling certain State and local  
11 elected officials, you recall that that was at the end of November.

12 A Uh-huh.

13 Q Is that right? Do you remember that it was after the election, the  
14 Presidential election in Pennsylvania, had been called?

15 Mr. Brothers. Objection, vague. Can you define "called"?

16

BY [REDACTED]

17 Q Sure. The -- well, your -- one of your responsibilities on election night was  
18 monitoring the media to determine when each network was calling the race.

19 A Uh-huh.

20 Q Announcing their conclusion about who would be the winner in the  
21 Presidential race. Is that correct?

22 A Is that correct that was my role on election night?

23 Q Yes.

24 A Yes.

25 Q Okay. And was Pennsylvania called on election night?

1           A    I don't remember.

2           Q    Okay.

3           A    I mean, there are 50 States, so --

4           Q    I remember that there were several contested States that weren't called on  
5 election night. Is that consistent with your recollection?

6           A    Yes.

7           Q    Yes. And I believe Pennsylvania was one of them that didn't get called  
8 immediately. Do you agree with that?

9           A    I agree.

10          Q    Okay. When you -- do you remember that there did come a time when the  
11 media had announced their conclusion about who would be the winner of the  
12 Presidential election in Pennsylvania?

13          A    I believe that they -- that they, being the media, had called the entire  
14 Presidential nationwide sometime the second week in November. So, yes, by your  
15 timeline that would be accurate.

16          Q    Okay. So you remember that your meeting with Mr. Brown occurred after  
17 that?

18          A    After the media had determined that Pennsylvania was going to be called for  
19 Joe Biden.

20          Q    Okay. And do you remember the secretary of state of Pennsylvania issuing  
21 an official result of the election while you were working for the campaign in  
22 Pennsylvania?

23          A    I don't have any recollection of when that happened.

24          Q    Okay. Do you -- you described for us the process that lawyers for the  
25 campaign were collecting affidavits.

1 A Uh-huh.

2 Q Do you have any understanding of what the status was of the Presidential  
3 election at that time?

4 A Can you clarify?

5 Q Sure. When you were assisting with sorting affidavits and declarations that  
6 were being collected by lawyers on behalf of the Trump campaign, do you have a -- do  
7 you remember what the status was of the Presidential -- the Presidential election in  
8 Pennsylvania at that time?

9 Mr. Brothers. Objection, vague. Can you define "status"? That could mean a  
10 lot of things.

11 BY [REDACTED]

12 Q Sure. Do you agree that there was litigation related to the outcome of the  
13 Presidential election in Pennsylvania?

14 A Do I -- I'm sorry. I'm just getting really confused as to what you're asking.

15 Q Sure.

16 A Maybe let's just start that question over.

17 Q Sure. I'm merely trying to establish the timing of when you met with  
18 Mr. Brown in the hotel room to discuss the project about calling State and local officials.

19 A Uh-huh.

20 Q And I'm trying to determine whether that was after the election result had  
21 been officially determined that President -- now President Biden had won the State of  
22 Pennsylvania.

23 A I told you that that meeting occurred sometime in the last couple of days of  
24 November. As far as being aware of the date when the election was officially or  
25 unofficially determined that Pennsylvania would go to President Biden, I don't know

1       when officially or unofficially Pennsylvania was called for Joe Biden, so I can't answer that  
2       question.

3               Q     Okay. Is it your understanding though that there -- the Trump campaign  
4       and lawyers supporting the Trump campaign were working to contest the outcome of the  
5       official, you know, the official result of the Presidential election in Pennsylvania?

6               A     I stated earlier that I have no idea what was going on on the litigation front  
7       for attorneys representing the Trump campaign, so I just -- I don't think I can answer that.  
8       I don't know.

9               [REDACTED] Okay. Maybe this is a good time to take our break?

10              Mr. Brothers. Okay.

11              [REDACTED] If that's -- Ms. Lofgren, unless you have any questions before we take  
12       a brief break?

13              Ms. Lofgren. No, I'm fine. And how long will the break be, do we think?

14              [REDACTED] Mr. Brothers, do you want to proceed with another sort of similar  
15       block of questioning or would you like to take a longer break?

16              Mr. Brothers. Can we have a conversation --

17              [REDACTED] Yeah.

18              Mr. Brothers. -- about how long you think we're going to be going?

19              [REDACTED] Yeah. Maybe --

20              Mr. Brothers. I don't know if we need to be on the record.

21              [REDACTED] Yeah, I think we can go off the record now.

22              [Recess.]

1

2 [12:19 p.m.]

3 [REDACTED] Ready to go back on the record? Great.

4 Hi, Ms. McCallum. I wanted to go through some of the documents that you

5 produced to the select committee. If you can turn to your binder, tab 4.

6 Mr. Brothers. And just for clarity, I'm assuming the document is behind tab 4,

7 right?

8 [REDACTED] Yes, it's the document behind tab 4. It looks like an iMessage

9 dated November 12, 2020.

10 Do you see that?

11 The Witness. I do.

12 [REDACTED] Great. So you can take a minute or two to review the

13 document.

14 Mr. Brothers. Thank you.

15 [REDACTED] Of course.

16 The Witness. Are we just looking at the first one or all pages?

17 [REDACTED] Yes, a good question. You can look through the various

18 pages --

19 The Witness. Okay.

20 [REDACTED] -- and just familiarize yourself. It's definitely not a memory

21 test, and you can refer to the document too. Yes --

22 Mr. Brothers. Thank you.

23 [REDACTED] -- you can take a second to look through it.

24 The Witness. Okay.

25 [REDACTED] Great.



1 BY [REDACTED]

2 Q So we're looking at the document behind tab 4. It looks like it appears to  
3 be a communication with "Nick I."

4 Do you know who Nick I is?

5 A That would be Nick Ivory.

6 Q Okay.

7 A We talked about him earlier. He was the elected officials outreach  
8 manager.

9 Q And you took a minute to look through this document. Do you recall which  
10 State this communication concerned?

11 A Pennsylvania.

12 Q And do you generally recall this communication with Mr. Ivory?

13 A What do you mean by "generally recall"?

14 Q Do you remember receiving this message, now that you've had a chance to  
15 look at it, that you had this communication with Mr. Ivory?

16 A Yes, I remember it.

17 Q So, if you look at, I believe, the first message you sent to him -- because it's a  
18 blue bubble. Does that sound right, that you sent that first blue message?

19 A Yes.

20 Q Okay. So you ask, "Hey do you have a good relationship with any  
21 commissioners in the following counties?" And you list four counties. Is that right?

22 A Correct.

23 Q Do you remember why you were asking Mr. Ivory if he had a good  
24 relationship with any commissioners in those four listed counties, which are Delaware,  
25 Montco, Chester, and Bucks?

1           A    Yes.  If you look at the second page, he sent a message that says, "What do  
2   you need to find out about?"  And I respond, "Just more hearing dates."  That was  
3   referring to provisional ballot review canvassing, I believe.

4           Q    Okay.  Thank you.

5           A    And do you recall, in those hearing dates, what they concerned other than, you  
6   know, broadly speaking, provisional ballot review?

7           A    I would believe that I was simply trying to find out when we needed to have  
8   observers, volunteers at the provisional ballot review.

9           Q    So you don't think this was actually concerning the hearings themselves?

10          A    I believe that a part of provisional ballot review has a type of hearing.  I  
11   don't know any, you know, more specifics on that.  "Hearing" is referencing a part of  
12   provisional ballot review.

13          Q    And do you know what relationship the commissioners have in these  
14   hearings?

15          A    Just trying to find a local contact who might know what dates these were  
16   occurring in these specific counties.

17          Q    Okay.  So, when you asked Mr. Ivory for that information, it was just for  
18   contact information for people to attend the hearing?  Or help me understand.

19          A    So I was asking him if he had a good relationship with any of these county  
20   commissioners in these four counties that I listed because I wanted to know if these  
21   county commissioners had knowledge of when these hearings for provisional ballot  
22   review were taking place.

23          Q    Okay.

24          A    If he had a relationship, it appears that I likely would've asked him to contact  
25   one of those individuals, rather than me, a stranger, contacting them.

1           Q    And is this the kind of information -- and you might not know this, and you  
2   can tell me -- that wouldn't be, like, available, like, publicly on a website?

3           A    I assume you could get the information if you called the county. But, at  
4   that time, you know, sometimes calling the county wasn't the most -- the quickest thing  
5   to do. Sometimes local and county governments aren't very responsive. So it was just  
6   a way to gather information on dates.

7           Q    So your recollection is you called -- or, excuse me -- you asked Mr. Ivory if he  
8   had any good relationship -- had a good relationship with any of, you know, the four  
9   listed county commissioners simply for, like, almost like logistical purposes or scheduling?

10          A    Correct. I stated earlier my role in the provisional ballot review was just  
11   scheduling volunteers to be at these counties. So, yes, that's my only goal with these.

12          Q    Understood.

13          And, if you recall, had someone asked you to reach out to Mr. Ivory to ask him this  
14   question?

15          A    Potentially Christina Norton, as my, you know, superior at this given time.  
16   I'm not exactly sure.

17          Q    Okay.

18          And do you remember what, if anything, you did, you know, with the information  
19   that Mr. Ivory gave you?

20          A    Well, it looks like he didn't have any information for me, because I said, "No  
21   worries if there aren't established relationships there," and then said I was going to have  
22   Fitz, referring to James Fitzgerald, call the county GOP chairs.

23          Q    And do you know if -- you said Mr. Fitzgerald?

24          A    Or, sorry, Fitzpatrick. I misspoke.

25          Q    Not a problem. Do you know if Mr. Fitzpatrick called the county GOP

1 chairs?

2 A I don't remember.

3 Q Okay.

4 And -- let's see. Okay. And do you recall, did you do other type of, you know,  
5 outreach to other people similar to this, where you were asking if they had a good  
6 relationship with commissioners maybe in other counties?

7 A Nick's -- Nicholas Ivory's role on the campaign, as an elected officials  
8 outreach manager, he handled relationships with county commissioners. So the only  
9 reason I was asking Nick is because he had been contacting various county commissioners  
10 over numerous States for months at this point.

11 Q Okay.

12 So, to the best of your understanding, these hearing dates that are referenced on  
13 the second page -- and I apologize, the Bates is very small. It's how it was produced to  
14 us. I believe it's 1574.

15 A Uh-huh.

16 Q The hearing dates, those did not concern alleged election fraud or alleged  
17 voter fraud? It was just provisional ballot review?

18 A To my knowledge, this was about provisional ballot review hearings.

19 Q Okay. Great.

20 [REDACTED] Yeah, just one question. On this document, your colleague  
21 Mr. Ivory says that his last day on staff is basically tomorrow, which would've been  
22 around November 13th. Do you know, did he leave the campaign, as anticipated, right  
23 after that?

24 The Witness. I assume. I don't remember any conversations I had with him  
25 after this.

1           [REDACTED] Okay. Thanks. That's all I had.

2

BY [REDACTED]

3           Q     We'll turn to another document. If you want to turn to the document  
4 behind tab 3, it's just a one-page text communication, with the Bates -- I think it's 604.

5           And you can take a minute, you and Mr. Brothers, to review the document.

6           A     Okay.

7           Q     You've both reviewed it?

8           A     Uh-huh.

9           Q     Okay. So this communication is dated November 28, 2020. Is that right?

10          A     Correct.

11          Q     And this is with Mr. Brown and Mr. -- excuse me, Ms. Crawley?

12          A     Yes, "Madi" being short for Madison.

13          Q     And we don't have the exact timestamp. That wasn't provided. So I'm  
14 not sure what time this was. But if you look at the fourth message down, Mr. Brown  
15 asks, "Can you pull all the donors to PA House Speaker Jake Cutler and cross reference  
16 them with DJT?"

17          Do you see that?

18          A     I do.

19          Q     Okay. Do you remember receiving this request?

20          A     Vaguely.

21          Q     Okay. Can you tell us what you remember about what he was asking for?

22          A     He said that he needed myself and Madison to pull the donors, meaning  
23 people who donated to Pennsylvania House Speaker Jake Cutler and people who donated  
24 to DJT, standing for Donald Trump's campaign, and, you know, seeing what names  
25 matched up.

1 Q And do you know why Mr. Brown wanted you and Ms. Crawley to see if any  
2 of the names matched up between donors of the House speaker and President Trump?

3 A He didn't specify in this message or in person that I remember.

4 Q So, as far as his request to pull all donors, it was limited to this  
5 communication, and you don't remember him providing any further details as to why he  
6 needed that information?

7 A Can I have a minute to --

8 Q Yes.

9 [Discussion off the record.]

10 The Witness. The only other thing I remember about this conversation in  
11 regards to, you know, why he might have wanted it: Somewhere else in my document  
12 production there was another message after this chain that says something to the effect  
13 of, "We want to put pressure on him tonight," and -- or tomorrow, or referencing some  
14 time in the near future. And I don't know what that's referring to. I just thought that  
15 that would be helpful context.

16

BY 

17 Q Thank you for that context.

18 A Uh-huh.

19 Q So you recall after this chain -- and it's possible it was out of order, and I  
20 apologize we don't have it here.

21 A I think so.

22 Mr. Brothers. I can try to find you, when we take a break, the Bates number.  
23 The text she is referring to I am almost certain is in the production. I would think it  
24 would come next, but I must admit I don't have the Bates numbers all memorized  
25 chronologically in my head.

1 [REDACTED] No. Understood.

2 The Witness. I saw it yesterday, yeah.

3 Mr. Brothers. Okay. Okay.

4 The Witness. I'm for sure it's in the documents.

5 Mr. Brothers. We're certain it's in there. We can get you a Bates number.

6 [REDACTED] Great. Well, thank you.

7

BY [REDACTED]

8 Q So, as I said, we don't have the document here, but, from what you  
9 remember, there was a message after this or at some point after where it was putting -- it  
10 was Mr. Brown saying, we want to put pressure on the Pennsylvania House speaker?

11 A I think it just said something along the lines of, "We want to put pressure on  
12 him tonight." I don't know who he's referring to. I would assume "him" being Speaker  
13 Cutler, but I'm not sure.

14 [REDACTED] Can I just do one point of clarification?

15 The speaker of the House's name -- the speaker of the House in Pennsylvania, his  
16 name is Bryan Cutler.

17 The Witness. Oh.

18 [REDACTED] There is also a Senate president in Pennsylvania whose name is Jake  
19 Corman. So it looks like this -- the name that's referenced here is a bit of a combination  
20 between the two.

21 But was it your understanding, Ms. McCallum, that the person who's being  
22 referred to is the person who held the office of speaker of the House in Pennsylvania?

23 The Witness. I assume. There may have been further clarification there once I  
24 started this, but I don't remember any -- I don't remember. I would assume Speaker  
25 Cutler being Bryan, but unsure.

1 [REDACTED] Okay.

2 [REDACTED] Thanks.

3 [REDACTED] Yep.

4 BY [REDACTED]

5 Q Do you know -- you said you recall a message about putting pressure on him  
6 tonight. Is that right?

7 A I -- we have to find the document.

8 Q Okay. Do you remember what was happening around this period of time,  
9 such that one might want to put pressure on Speaker Cutler?

10 A No. Like I said earlier, I wasn't involved in the conversations related to why  
11 we were asked to do certain things.

12 Q Had you been asked this kind of request before, to pull donor data, on other  
13 legislators at the State level or Federal?

14 A None that I recall.

15 Q So, from your recollection, this was, like, the first time that you'd received  
16 this kind of request?

17 A I think so. I may have been asked to do that -- like I described earlier,  
18 Madison and I did informal vetting on people. I may have looked, you know, at the FEC  
19 website once or twice before in something related to that, but I don't recall any.

20 Q And with respect to the pressure to put on the House Speaker Cutler, was it  
21 your understanding it was financial pressure if it related to pulling donor data?

22 A I have no idea. I didn't send the message. So you'd have to ask Michael  
23 Brown as to what kind of pressure he was referring to.

24 Q Do you know if anyone pulled the donor data for House Speaker Cutler and  
25 cross-referenced them with President Trump?



1 A I believe Madison and I --

2 Q Yeah.

3 A -- did as instructed, but I can't confirm that.

4 Q So you believe it might have been you and Ms. Crawley that assisted but  
5 you're not 100 percent sure. Is that fair?

6 A Yeah. We were -- yes. We were asked to do it, so I assume that we  
7 performed that task.

8 Q And you don't recall what Mr. Brown might have done with this information?

9 A I do not.

10 Q And did you do anything further with the information that you pulled other  
11 than provide it to Mr. Brown?

12 A No. I assume I just sent it back to him.

13 Q And do you recall was it in a spreadsheet or how you transmitted the  
14 information to Mr. Brown?

15 A I was cross-referencing it. I would've very likely used Excel to match up  
16 names.

17 Q Okay. Perfect. Thank you.

18 A Uh-huh.

19 Q Turn to the document behind tab 5. And if you want to take a minute to  
20 review. It's just one page, I believe. I believe it's Bates -- I believe that's 59.

21 A Uh-huh.

22 Okay.

23 Q And this is a communication dated November 12, 2020. Is that right?

24 A That's what I see, yes.

25 Q There's not a name associated with this text message. Do you recall who

1 sent you this message?

2 Mr. Brothers. One moment, counsel.

3 [Discussion off the record.]

4 The Witness. Okay.

5 Mr. Brothers. Thanks, counsel.

6 The Witness. Can you repeat the question?

7

BY [REDACTED]

8 Q Sure. Do you recall who sent you this message which is behind tab 5?

9 A No. I would assume, based on the conversation, that it is a provisional  
10 ballot, you know, volunteer observer.

11 Q Great.

12 And, in her message, she said that -- or, excuse me, this person; I'm not sure of the  
13 gender -- that "we already anticipate having to go to court after our election commission  
14 hearing tomorrow. Is there a pre-prepped doc that we can use to adjust for a quick  
15 filing?"

16 Do you know what kind of filing this individual was referring to?

17 A Based on, you know, the date and the conversation and it being  
18 Northampton, which is, I believe, a county in Pennsylvania, you know, I think this is  
19 related to provisional ballots for filing? You know, I don't know exactly what she's  
20 referring to. There's, you know, a process where they reject or keep provisional ballots  
21 in some kind of, you know, hearing format. So I assume that that's the filing she's  
22 referring to.

23 Q Do you know, when she says a pre-prepped doc, what that means?

24 A I don't.

25 Q But you believe it might relate to something to do with provisional ballots?

1           A     Correct.

2           Q     And, at the time -- this was November 12th -- what were you working on  
3 with respect to the provisional ballots in Pennsylvania?

4           A     Solely just, you know, coordinating with volunteers who were observing at  
5 these particular counties.

6           Q     Do you recall, was there a challenge with respect to the provisional ballots in  
7 Northampton around this time?

8           A     I don't know. Like I said, there was a lot of counties that we handled in  
9 Pennsylvania, so I won't be able to recall the outcome of any particular county.

10          Q     Is it your understanding that there was a provisional review process in more  
11 than one county in Pennsylvania?

12          A     Yes.

13          Q     Okay. And you were involved in the various counties.

14          A     Multiple counties.

15          Q     Multiple counties. So you can't recall the different Pennsylvania counties  
16 that you were involved with, with respect to provisional ballot review.

17          A     I don't -- I don't think I -- I mean, I don't have a comprehensive list in my  
18 head of every county. I mean, Christy and I had multiple, multiple counties. So I don't  
19 know, you know, what was going on particularly in Northampton on November 12th. I  
20 don't recall.

21          Q     And I believe you said the individual who texted you might have been a  
22 volunteer. Is that right?

23          A     Yes.

24          Q     So you don't believe this was someone who was working for the Trump  
25 campaign at this time.

1           A    I don't believe so, but I can't confirm. I don't have the number saved, so --

2           Q    Right. Okay. Thank you.

3           [REDACTED] Yeah, just one question. I know that we received all these  
4 documents in a production from your firm, Mr. Brothers, but I don't believe we received a  
5 privilege log. Can you explain for us the basis for redactions on this document?

6           Mr. Brothers. Yeah. So the redactions are the First Amendment privilege we  
7 asserted in our letter that covers voters and campaign volunteers. But, I should say,  
8 that's not only a First Amendment privilege objection but also a legislative purpose and  
9 pertinence objection is the basis for that redaction.

10          [REDACTED] Thank you for that response.

11          Setting that aside, it seems that the information that you redacted here might also  
12 be described as redacted for personal, identifying, or private information. Is that an  
13 accurate assumption on my part?

14          Mr. Brothers. That's accurate.

15          [REDACTED] Okay. All right. Let's leave it there, and then we can move on.

16          [REDACTED] Great.

17

BY [REDACTED]

18          Q    Earlier, you had mentioned you'd done some work in Georgia -- is that  
19 right? -- in connection with the 2020 election? Or with just the recount -- or just  
20 the -- excuse me -- the runoff elections in Georgia?

21          A    I performed work with both, both the runoff and the general Presidential  
22 election.

23          Sorry. Let me be more clear. I performed work for the National Republican  
24 Senatorial Committee for solely the Senate runoff. Did not do anything for the Senate  
25 general.

1           And then in my role for the Trump campaign, I performed work in Georgia, not  
2 physically in Georgia, but --

3           Q    So let's just walk through the Trump campaign work that you did with  
4 respect to Georgia in the 2020 election.

5           A    Okay.

6           Q    Can you tell us, you know, when did you get involved in the Presidential  
7 election with respect to Georgia in 2020?

8           A    Well, Georgia was one of our battleground States. Like I mentioned earlier  
9 with the elected officials outreach office, Olivia and Nick were, you know, having  
10 communications and conversations with State senators, State representatives, county  
11 commissioners, potentially county sheriffs as well. So, you know, a lot of those job  
12 duties that I mentioned earlier, like collecting information to put into weekly reports, I did  
13 that in Georgia.

14          Um -- that's all I have for that question.

15          Q    So I'll just take it step by step.

16          A    Yeah.

17          Q    Did you do work with respect to Georgia for the Trump campaign before  
18 election day?

19          A    Before election day, it would be, you know, any kind of communications  
20 tracking that Olivia and Nick had me do, in respect to if there was an op-ed published or a  
21 radio interview, that was something, or if they had messaging and talking points from a  
22 conversation that Olivia had with a State rep, something like that.

23          Q    And when you collected that information, tracked it, do you know how it  
24 was being used?

25          A    It was just sent in a -- Madison and myself compiled that information into a

1 weekly report, and that report went to Jim. And I don't know what Jim O'Connell did  
2 with it after that.

3 Q And who else were you working with with respect to Georgia  
4 pre-election-day in the Trump campaign, if you recall?

5 A Pre-election-day, we were also sending volunteers. When Madison and I  
6 assisted the Election Day Operations Team in coordinating travel plans with volunteers  
7 who were going to work in Georgia the week of the election, Madison and I called, you  
8 know, a couple people and asked, would you be willing to go to Atlanta, Georgia?  
9 Something like that.

10 Q And do you recall what those volunteers would be doing? Or your job was  
11 just to send them there, and someone else would give them that information?

12 A I don't recall any specific tasks that, you know, Madison and I were -- we  
13 weren't sending people there, saying, you know, this is exactly what you will be doing  
14 while you're in Georgia for these days.

15 Madison and I were really just doing this from a, you know, national level,  
16 meaning that, you know, once these people got there, the respective State directors  
17 would be telling them what they would be doing.

18 Q Do you recall who the State director for the Trump campaign in Georgia  
19 was?

20 A The State director for election day operations is Robert -- or was Robert  
21 Sinners.

22 Q Robert Sinners?

23 A Sinners, S-i-n-n-e-r-s.

24 Q And that was at the national level, or was that specifically related to  
25 Georgia?

1           A    He was the Georgia State director of election day operations. But you'd  
2   have to confirm with him on his official title. That was just my understanding.

3           Q    And, on election day, I believe you said earlier you were just watching the  
4   news --

5           A    Uh-huh.

6           Q    -- and watching media reports about ballots and vote counts and whatnot.  
7   Is that accurate?

8           A    Yes. On election day, I was still, like I said, just watching the news.

9           Q    Did you have any other responsibilities specific to Georgia on election day,  
10  like sending volunteers on election day to Georgia?

11          A    Specifically on election day, I had no communications related to Georgia,  
12  except for what was being said in the news. I don't remember if Georgia was called on  
13  election night or not. If it was, that's the only thing Georgia-related I would've done that  
14  day.

15          Q    And, after election day, on November 3, 2020, what work did you do with  
16  respect to Georgia for the Trump campaign specifically?

17          A    The same calls that were made into Michigan for State legislators were also  
18  made into Georgia.

19          Q    And when you say "same calls," can you be more specific what you're  
20  referring to?

21          A    The document we briefly discussed earlier with the text message script from  
22  Michael Brown. I don't know if the exact script was used or if, you know, it was altered  
23  slightly to fit what was going on in Georgia. Similar to that is what I'm referring to.  
24  Some scripted call.

25          Q    And I believe we have that exhibit, so maybe we should just turn to it now.

1           A    Okay.

2           Q    Do you want to turn to tab 6?   Let's make sure we're all on the same page.

3   The document behind there is a text chain.   I believe it's two pages --

4           A    Uh-huh.

5           Q    -- beginning with 600.   Do you want to take a second to review that?

6           A    Yeah, I don't really need a second to review this.

7           Q    Okay.

8           A    What I want to say about this specific text chain and anything sent in this  
9   text chain with these, you know, seven people that I don't -- like I said, this message came  
10   from a number that I don't recognize.   This was something that some random person  
11   who somehow has my number sent me.   I have no idea what this is.

12          Q    So -- okay.   I'll just start from the beginning.

13          A    Uh-huh.

14          Q    Okay.   So this is a text chain from November 16, 2020.   Your recollection  
15   is you got this text, you know, randomly.   You don't know who even sent it to you.

16          A    That's correct.

17          Q    Okay.   So, even if you don't know who sent this to you, did you do anything  
18   with respect to their request?

19          A    I did not copy and paste the email letter below, and I did not insert my  
20   name, and I did not email Georgia Senator Mike Dugan.

21          Q    So you did not -- you did not email -- or, did you call Mike Dugan, to your  
22   recollection?

23          A    He potentially was on my call list for the State legislator calls instructed by  
24   Michael Brown.   I don't remember his specific name.   It doesn't stand out to me.

25          Q    If you would have called Senator Mike Dugan, would you have used this



1 script that's in this text chain we're looking at behind tab 6?

2 A No.

3 Q Okay. What would you have -- is there a different script you would've  
4 used?

5 A It would be the document behind tab 7.

6 Q Okay. And so let's turn to tab 7. And, for the record, it's Bates 1570.

7 So this here, it's called a "Basic Script." Why don't you walk us through what it is  
8 that we're looking at?

9 A Can I have a moment to review this document?

10 Q Oh, yes, of course. Absolutely.

11 A Thank you.

12 Okay.

13 Q So this appears to be a script to use with elected officials -- is that  
14 right? -- when you're calling them.

15 A Correct.

16 Q Okay. How did you use, if at all, this script when you contacted elected  
17 officials in Georgia?

18 A I would've read it.

19 Q Read it --

20 A Read it. I mean, called them, read the script.

21 Q Do you recall who sent you this script?

22 A This seems to be a variation of the original script I received via text message  
23 from Michael Brown. I would assume that this script also came from Michael Brown  
24 with edits specific to Georgia.

25

BY [REDACTED]

1           Q    Ms. McCallum, just to tie this back to the conversation that we were having  
2   before our last break, is this connected with that meeting that you recalled you had with  
3   a couple of your colleagues as well as Mr. Brown in a hotel when you were in Philadelphia  
4   in late November?

5           A    Yes.   There may have been more than one of those same types of meeting  
6   with the script being presented to us and us being assigned, you know, which  
7   representatives or senators to call, based on what State it was.

8           Q    Okay.   And that first meeting that we had just started to talk about before  
9   our break, do you remember, was that specific to one State?

10          A    I don't remember what State was called into first.

11          Q    How many of those meetings with accompanying scripts and phone lists do  
12   you recall participating in with Mr. Brown?

13          A    I can recall a few States.   I'm not sure how many different meetings there  
14   were, you know, to go over a specific State.   Some of those States were Michigan, as you  
15   know; Georgia; Arizona.   And Nevada and Pennsylvania come to my mind.   I don't  
16   know if there were calls performed into both of those States.

17          Q    Okay.

18               And so I asked you some questions about the first meeting, but perhaps I  
19   should've been a bit more broad.

20          A    Uh-huh.

21          Q    In all of the meetings that you had with Mr. Brown related to calls into  
22   particular States -- and I take your point that it may have been a couple of States that  
23   were discussed at the same meeting.   But, in all of those meetings, do you remember in  
24   any of those meetings Mr. Brown telling you what the purpose was of making these calls?

25          A    No, I don't remember any particular purpose that he mentioned in any

1 meeting for any State.

2 Q Okay.

3 Whether it was Mr. Brown or someone else who participated in the meeting, did  
4 anyone ever tell you or give you an idea of how these calls fit into the overall strategy for  
5 the Trump campaign?

6 A No. Like I said, I wasn't involved in any conversations about strategy, being  
7 a low-level campaign employee. This was my first job out of college. No one would've  
8 ever talked to me about strategy.

9 Q Well, in those meetings, when you're talking to Mr. Brown about making  
10 these calls, did he ever give you any background information at all about the project,  
11 other than the script and the numbers to call?

12 A In one text message -- I don't know what exhibit number it would be -- I  
13 believe that Michael Brown said something along the lines of "I spoke with Roman,"  
14 referring to Mike Roman. But that's really all that comes to mind in regards to  
15 background on the calls.

16 Q Okay. Did you ever learn what the relevance was to Mr. Brown of speaking  
17 to Roman?

18 A Well, like I stated earlier, Michael Brown reported to Mike Roman, so a  
19 conversation between, you know, my boss and his boss would make sense.

20 Q Understood. So was it your understanding at the time that Mr. Brown was  
21 giving you an assignment that Mr. Roman had either given to him or had directed him to  
22 give to you?

23 A I would assume that that would be the case, but that would be something  
24 you'd have to, you know, confirm with Michael Brown.

25 Q Understood.

1           And I asked you a couple questions earlier about that first meeting, but for all of  
2       these meetings or any other communications that you had with Mr. Brown about calls to  
3       State and local officials, did anyone, you or any of your colleagues, ever raise any  
4       concerns about making the calls?

5           A     I had concerns after the, you know, Michigan voicemail was publicized.   My  
6       concerns were related to the fact that my personal cell phone number had been  
7       published on the internet, and, you know, that was my full name.   So my concerns were  
8       mostly about, you know, how that would affect me personally.

9           Q     Understood.   And I'm sorry that that happened.

10          A     Yes.

11          Q     Okay.   That's all I had.

12          BY     [REDACTED]

13          Q     Do you recall who received this script related to Georgia?

14          A     Are you asking who received the scripts or who received the calls?

15          Q     Who received the actual -- the script?

16          A     The actual copy of the script?

17          Q     Right, what we're looking at behind tab 7.

18          A     That would be the same group of people I mentioned earlier with the calls:  
19       myself, Madison Crawley, Chelsea Barnett, and Kerrick Kuder.

20          Q     And what was your understanding as to what you were supposed to do with  
21       this script?

22          A     This is a script to make the same calls that we've been talking about to the  
23       State representatives and State senators.

24          Q     And did you have any sort of ability to edit the script or revise the script?

25          A     As a low-level campaign staffer, you know, I never really altered from the

1 script. Like I said, it was a job assignment to me, and that's how I took it. So, no, I  
2 don't recall any particular edits that I would've made to it.

3 I mean, potentially, you know, not using their choice of words, you know, but very  
4 basic. I'm trying to think of an example. Yeah, just rewording things, you know, in my  
5 own terms. For example, maybe, you know, not saying my name first and saying that at  
6 the end of that sentence. Something just -- you know, sentence structure.

7 Q Are there any other, looking at this, any other statements that stick out to  
8 you that you think you might have revised when making a phone call to an elected  
9 official?

10 A No. Nothing more than sentence structure.

11 Q Okay.

12 Was it your understanding that you and Madison, Chelsea, and Kerrick were to call  
13 the elected officials all around the same time using this script?

14 A I believe, in the meetings that we've been talking about about making the  
15 calls, that after those meetings is when we all went to separate rooms and made the calls.  
16 So I would assume it would be, you know, all around the same time.

17 And I did also want to point out that I believe the script was revised, as well, in an  
18 email format, which Kerrick would've been sending.

19 Q And when you say "revised in an email format," do you mean so it would be  
20 structured --

21 A Structured as an email versus as a call script.

22 Q Understood.

23 A Which is also -- I think that email is public record as well.

24 Q For the State of Georgia or for a different State?

25 A I believe that Kerrick's email is in this article that's cited somewhere in the

1 subpoena cover letter.

2 Q Got it.

3 A This MLive thing, I think that --

4 Q For the State of Michigan.

5 A Yes. I believe I -- that's the only State I know of of a specific email. I don't  
6 know if Kerrick or anyone else sent emails into other States. That's the only email I was  
7 referring to.

8 Q Is it fair to say that, like, there was this basic script and there might've been  
9 some small changes over time but it mostly stayed the same, for purposes of calling the  
10 elected officials?

11 A I don't recall any edits being made to the script.

12 Q So you think, across the different States, it was more or less similar to the  
13 script we're looking at behind tab 7? Is that fair to say? Assuming, you know,  
14 understanding people might have --

15 A For the most part, I mean, this script, I believe, is different than the one that  
16 we've been talking about in the text message with Michael Brown. I believe it differs  
17 slightly, because there -- it's a different script for different States, because, obviously, I  
18 wouldn't be telling a representative in Michigan about what was going on in Georgia at  
19 the given moment. So --

20 Q So, if you look at the script and if you look at the paragraph, "I wanted to  
21 personally reach out to you on behalf of the President," like, do you recall if that sentence  
22 usually stayed across the scripts?

23 A I can't recall.

24 Q Okay.

25 A I can't speak to the specific differences between States. That's in the

1 different documents that I presented.

2 Q When you said you would have these meetings and then go back -- I think it  
3 was, you said you, Madison, Chelsea, and Kerrick would go back and make the phone  
4 calls -- was this over the course of a day, a number of hours, or weeks that you would call  
5 these elected officials with the script?

6 A I believe that for all the calls that were made across various States it was a  
7 less-than-a-week time span. Like, more along the lines of all calls were made within a  
8 couple of days. I mean, these were all made, like I stated earlier, at the very end of  
9 November, first couple of days in December.

10 And, like I stated, when I left Philadelphia, you know, I basically went straight to  
11 Georgia, with the exception of stopping in South Carolina for a couple days. So I would  
12 have, you know, moved on to the Georgia Senate runoff at that point. So, very short  
13 time period for these.

14 Q Do you recall if, when you were -- I'll ask you this: Were you getting  
15 assignments from Mr. Brown about which States to call elected officials from?

16 A Yes. Assignments on which States to call when, and then also assignments  
17 on which one of the four of us -- and I believe that Michael was also making these calls,  
18 but I don't have any confirmation on that. So maybe let's say the five of us.

19 Sorry. I forgot the question mid-answer.

20 Q No, not a problem. So I want to confirm, Mr. Brown gave you and your  
21 four colleagues -- Madison, Chelsea, and Kerrick -- assignments as to which States to call  
22 elected officials from. Is that correct?

23 A Yes, which States and, further, you know, which representatives or which  
24 senators in that particular State were also assigned to us.

25 Q Okay. So Mr. Brown also told you the specific elected officials to call for

1 the different States, to the best of your recollection.

2 A To the best of my recollection. I think that it was also just basically, like, a  
3 situation where, you know, I have five, so Madison has five, so Kerrick has five, so Chelsea  
4 has five. You know, it was also a just fairness of splitting up people's time as well, you  
5 know, so we were all, you know, making five calls or whatever it was.

6 Q And do you recall that you all were -- all the four of you, or potentially five if  
7 Mr. Brown was making calls as well, were calling elected officials in more than one State,  
8 not just Georgia?

9 A Never more than one State at a time, I don't believe. So we would all be  
10 calling into the same State at one given time.

11 Q Do you -- and I recognize it's been some time -- do you recall the order of  
12 States that you called elected officials from?

13 A No. And I really -- I can't even speculate on it. I have no idea, the order.  
14 I do -- actually, I do take that back. I know that Michigan took place sometime before  
15 Georgia. But as far as other order goes, no idea.

16 Q Do you recall if the phone calls were -- well, I'll direct you to the document.  
17 It mentions on tab 7, if you look at the paragraph starting, "Right now, Mayor Giuliani is  
18 presenting experts and witnesses from Georgia to the Senate judiciary committee who  
19 will show the vote totals are fatally flawed and do not accurately represent the will of the  
20 voters" -- so you can see here there's a reference to Mayor Giuliani presenting experts  
21 and witnesses. Do you see that?

22 A I see it, yes.

23 Q Do you recall whether these calls to the State officials were coordinated with  
24 when Mr. Giuliani was presenting experts and witnesses in the State?

25 A Based on the script, I mean, I can only assume that the timing of those -- you



1 know, me making the calls and the timing of the presentation match up.

2 Q Did you have any involvement in Mayor Giuliani's presentation of experts  
3 and witnesses in any States in connection with the 2020 election?

4 A None that I can recall.

5 I want to go back to something I said earlier about printing. I said that there was  
6 a time where I was printing those affidavits and declarations. I don't know what -- sorry,  
7 I got distracted.

8 Q That's okay.

9 A I don't know what exactly that printing was used for. I believe it was some  
10 kind of hearing or something like that. So, potentially, a presentation of witnesses could  
11 have to do with me printing those documents. But, like I said, I was not the one  
12 collecting those affidavits or anything like that. So, directly, no, I don't have anything to  
13 do with the presentation.

14 Q Do you recall ever being introduced to individuals who were described to be  
15 experts and witnesses associated with Mr. Giuliani in any of the States?

16 A No. No introduction to experts or witnesses or any introduction to Mayor  
17 Giuliani.

18 Q In connection with when you received this script, were you provided any  
19 further information regarding the substance of what was being -- of the claims made in  
20 the script?

21 A Can you repeat the question?

22 Q Sure, and I can rephrase it.

23 A Thank you.

24 Q When you received the script, did you receive any further information  
25 about -- about the claims being made in the script?

1           A    Any further information about the claims in the script?

2           Q    So I'll say this: To the extent someone would ask a question about  
3 something that you were asking in the script, were you provided any information so you  
4 could follow up and potentially answer their question?

5           A    No. Mostly, what I did with these calls is leave voicemails. No one was  
6 really answering the phone.

7               And if I did get a hold of someone and they had a question like that, I would make  
8 note of that, note their question or request or whatever it was on a spreadsheet. And I  
9 don't know if those notes were ever read or if anyone ever followed up with them.

10          Q    Do you recall anyone asking questions about anything that you said after  
11 reciting your script?

12          A    No, I don't recall any particular questions that anyone had.

13          Q    So you don't recall anyone asking any questions about, for example, that  
14 when you're calling a State official, elected official, that they have the power to reclaim  
15 their authority to send a slate of electors? Do you recall anyone asking questions about  
16 that statement?

17          A    No, I don't remember any conversations with State representatives or  
18 senators about that, about the power to reclaim.

19          Q    Did you ever ask Mr. Brown or anyone else about the script, any questions  
20 about the script?

21          A    No. And I want to repeat myself from earlier: You know, as a low-level  
22 campaign staffer who really just looked at this as another job assignment, I didn't really  
23 give it much thought.

24               That's all I have to say.

25          Q    If you go towards kind of the middle of the script, it says, "This is a clear path

1 to correct the attempted theft of this election." Do you see that sentence?

2 A I see it, yes.

3 Q Do you recall anyone ever giving you any information regarding the so-called  
4 attempted theft of the election, like, what you could point to if someone were to ask you  
5 what that meant?

6 A No. And I want to repeat myself. You know, I answered your question  
7 about whether or not I'd received background information on this script, and the answer  
8 is still no. If anyone ever asked me a question, I would've just made a note of it on a  
9 spreadsheet and sent that to -- you know, I guess it would be in a shared document with  
10 Michael Brown.

11 Q And, in the document that you provided your notes, was this document  
12 already pre-populated with the different elected officials and so you were just going in  
13 and filling in notes?

14 A Can you clarify, particularly the "prepopulated" part? I'm a little confused  
15 there.

16 Q Yes. So, when you -- you said that you filled out a document and put in  
17 notes after you called elected officials. Is that right?

18 A Yes. So my name would be -- the way that it was laid out is there would be,  
19 you know, a senator's name, their contact -- senator or representative's name or contact  
20 information and, you know, whoever the assigned caller was decided. And we would  
21 just basically go in there and say, "Left voicemail," you know, or, if someone actually  
22 answered, there would be, you know, a note about what that person said when the  
23 phone was answered.

24 Q Was there any type of followup if you had left a voicemail with an elected  
25 official?

1           A    Not on my end, unless, you know, they had texted me after that or  
2 something like that. You know, it's not like I ever called them. I don't believe I called  
3 anyone more than once.

4           Q    Do you know if anyone else was following up with elected officials that you  
5 were not able to reach?

6           A    I don't know.

7           Q    And I just want to confirm, did you say the calls to the different elected  
8 officials from different States happened within about a week's time, end of November,  
9 early December? Is that right?

10          A    Yeah. I would -- and instead of a week, I would probably say a couple of  
11 days. Definitely less than a week.

12          Q    And so the way it went, Mr. Brown would give you all the State, and you had  
13 your assignments, and you'd call up the elected officials using the script provided to you?

14          A    State, script, contact information, and then, yeah, we would make the calls.

15          Q    Do you recall how many elected officials that you called in Georgia in  
16 connection with the November 2020 election and, you know, using the script?

17          A    Me personally?

18          Q    Yes.

19          A    I have no recollection of how many calls I made.

20          Q    Is it fair to say because it was too many to count?

21          A    No. I would attribute it more to the fact that this happened, you know, at  
22 this point, it would've been over a year ago. I don't remember, you know, the duration  
23 of the event, you know, how extensive it was or anything like that, for any particular  
24 State.

25          Q    And when you were conducting this outreach, this was all on behalf of the

1 Trump campaign, with the elected officials?

2 A As opposed to on behalf of who?

3 Q The Republican -- the National Republican Senatorial Committee.

4 A Correct. I was doing this for Trump campaign.

5 Q And when you were making these phone calls, do you recall where you  
6 were?

7 A In Philadelphia, in a hotel room.

8 Q Okay. I was just asking because, like, in this script, it says, you know,  
9 "calling from Trump campaign headquarters in Washington, D.C.," but you believe you  
10 might have been in Philly.

11 A Yes, I was in Philly. And, like I said, I followed the script.

12 Q Did you ever contact any elected officials who were not in the spreadsheet  
13 that you described?

14 A No.

15 Q So your phone calls were limited to your assignments in the spreadsheet?

16 A Yes.

17 BY [REDACTED]

18 Q I just had a couple of questions for you, Ms. McCallum, about the scripts that  
19 we were discussing behind tab 7.

20 A Uh-huh.

21 Q So my colleague noted the sentence that says, "This is a clear path to correct  
22 the attempted theft of this election."

23 What did you understand "attempted theft" to be referring to?

24 Mr. Brothers. Just to clarify, understand, to put a date on that, at the time that  
25 she was provided the script?

1           [REDACTED] Sure. Yeah, that's a helpful clarification.

2

BY [REDACTED]

3           Q     At the time that you made the calls based on the script that you were given,  
4 what did you understand what "attempted theft" referred to?

5           A     You know, I just -- like I said, I don't think I really gave it much thought. I  
6 really -- you know, it was just another job assignment to me.

7           Q     Okay. And, at any later point of time, did you come to have a different  
8 understanding of what "attempted theft" might refer to?

9           A     I mean, I believe that that's, you know, another way of -- you know, this  
10 script's referring to election fraud. But, I mean, I -- like I said, I didn't write the script. I  
11 don't know what it was referring to.

12          Q     Understood.

13          And the same question for you about the sentence just above that one, where it  
14 says to the audience of State legislators, "You have the power to reclaim your authority to  
15 send a slate of Electors."

16          At the time that you made the calls based on this script that you were given, what  
17 did you understand that to refer to?

18          A     I think I pretty much have the same answer as the previous question. I  
19 really didn't give it much thought. I mean, thinking -- yeah. I don't have any more to  
20 that question.

21          Q     Okay.

22          And same question for you about that one. At any point later, did you come to  
23 have a different understanding of what this refers to, about "authority to send a slate of  
24 Electors"?

25          A     Yeah. I mean -- sorry. Similar to the question I answered before about

1 the line below that, I didn't write the script; I don't know what the intended meaning was.  
2 I would assume that the script is referring to an alternate slate of electors. But I don't  
3 know beyond that.

4 Q Okay.

5 And, before our last break, I think we were talking past each other a little bit  
6 about the outcome of the election --

7 A Uh-huh.

8 Q -- in Pennsylvania, so let me just ask you a question to clarify.

9 You have described to us that calls were made, based off this script or something  
10 similar to it, to legislators in Michigan, Georgia, Arizona, Nevada, and Pennsylvania, some  
11 combination of those States, towards the end of November or early December of 2020.  
12 Is that correct?

13 A That's correct. And I did want to make the clarification, as I don't have  
14 any -- I can't confirm that calls were made into Pennsylvania and Nevada. I don't have  
15 any, like, particular memory of those States.

16 Q Okay.

17 A So -- but, potentially, yes.

18 Q Got it.

19 Those States that I just listed that we're just discussing, do you agree that these  
20 are States that had been called for President Biden that then-President Trump had lost in  
21 the November election?

22 A I'd go back to the same problem we were having earlier, as the vagueness of  
23 the word "called."

24 Q Okay. Do you agree that these States that are identified, that we've been  
25 talking about and for which you were asked to make calls to State legislators, that the

1 outcome of the Presidential election at the time that you were making the calls was that  
2 they had been -- that, in those States, President Biden had been determined to be the  
3 winner of the Presidential election?

4 Mr. Brothers. I'm going to object to vagueness. I think the problem we're  
5 running into here is, determining the results of an election is somewhat complex, right?  
6 You have the media call, and we all know that occurs weeks before the formal  
7 governmental steps occur.

8 And so, when you say "outcome determined" or "called," there is absolutely no  
9 clarification of what you're meaning, whether you're meaning media's calling this or  
10 whether you're meaning that the formal legislative process has been completed.

11 So she has no guidance for how to determine if she had personal knowledge at the  
12 time of the call whether the media had called for that State or whether she had personal  
13 knowledge that the State had finished whatever formal process it could be. And I will  
14 note that the State's formal processes include multiple actors, like the secretary of state  
15 and the legislators and all of that.

16 And so at what point you're in that process has become the nebulous thing. So I  
17 think I'm going to object to vagueness. I would suggest we really -- if you want these  
18 questions answered, we really need to get specific.

19 [REDACTED] Okay. How about --

20 The Witness. Let me --

21 [REDACTED] Sorry. Go ahead.

22 The Witness. I just have something more to add on that.

23 You know, I'm not a Rolodex of dates. I can't just recite to you when the  
24 secretary of state in a certain State said, you know, the election was certified or complete  
25 or something like that. I don't know.



1           So I just really don't feel like I can answer that question. Even if we, you know,  
2       decipher between media and official and all the steps within the official, I just -- I don't  
3       think that I can fully answer that question.

4           BY [REDACTED]

5           Q    Okay. Let me try to put this in a different way. Let me rephrase --

6           A    Okay.

7           Q    -- one more time, and then we'll take a break.

8           The selection of States that we've been discussing that you were asked to make  
9       phone calls into to reach State legislators, by the time that you were making the calls, do  
10      you understand that the purpose of making the calls was to have something change  
11      about the outcome of the election?

12          A    I'm going to go back to what I said earlier, is, I was never aware of, you  
13      know, what the particular purpose of these calls were. You know, I wasn't looped in on  
14      any conversations related to strategy or, you know, as it says here, "the clear path." I  
15      was never looped in on those conversations. I can't comment on the purpose of the  
16      calls other than I made them because someone told me to and that was my job.

17          Q    Okay.

18          Were any of the States that you were calling into States where you were asking  
19      State legislators to defend the outcome of the election at the time that it was there -- at  
20      the time that you were making the calls, rather?

21          A    Can you clarify what you mean by "defend the outcome"?

22          Q    Sure. So the sentence that we were just discussing a moment ago in the  
23      script refers to sending a slate of electors that will support President Trump. My, sort  
24      of, reading of that, understanding of that, is that you're asking the legislators to do  
25      something. Is that accurate?

1           A    I have to say, you know, that that's how the script reads, but I didn't write  
2   the script, so I just -- I don't know what the author of the script, you know, really meant  
3   by that.

4           Q    Okay.  I'll ask you just an open-ended question, and then we can take a  
5   break.

6           A    Okay.

7           Q    It seems to me that making calls into this particular set of States that we've  
8   been discussing was for the goal of effecting some change in the circumstances at the  
9   time that you were making the calls.  Does that seem accurate to you?

10          A    I really just thought of the calls as, from my perspective, to be more of an  
11   informative -- of, you know, this is, you know, I'd say, how you could be helpful.  I  
12   thought of them as more, you know, informative, based on that language.

13          So, I mean, like I said, I can't speak to the purpose of the calls.  I was not involved  
14   in those meetings.

15          Q    Okay.

16          And, at the time that you were making the calls, did you consider the outcome of  
17   the election to be determined or not yet determined?

18          Mr. Brothers.  I'm going to object to any question that gets into the witness's  
19   personal beliefs about the election.  I have numerous objections to that.

20          The first would be, it's not pertinent to a committee function.  The committee is  
21   tasked with investigating January 6th and the causes of January 6th.  The witness's own  
22   mental impressions or own personal political beliefs as to what happened on election day  
23   or thereafter or since will not inform this committee in any way to legislate.

24          Furthermore, there is no legislative purpose.  This committee cannot  
25   recommend legislation that would affect this witness's or anyone's mental impressions or

1       personal beliefs about the election or what happened thereafter.

2               I am also going to assert a First Amendment privilege objection. By asking her  
3       for her personal political beliefs, you are engaging in conduct that could chill political  
4       expression, political association, political speech, by people knowing that, if they engage  
5       in that, that Congress could bring them before them and ask them about personal  
6       political beliefs.

7               So, for all of those reasons, I'm objecting and I'm instructing Ms. McCallum not to  
8       answer that question.

9               ██████████ Okay. I'll just respond to a couple of the points that you made.

10              First, to explain that the charter of the select committee, House Resolution 503,  
11       tasks the committee with investigating not only the events of January 6th itself but also  
12       the causes of January 6th. And, in particular, one of the things that we are focused on  
13       are attempts to interfere or affect the outcome of the election and, in particular, how  
14       those actions played out in the States.

15              So I appreciate all of the answers that your client has given us thus far about these  
16       calls and the communications around them, because I think it is clearly related to the  
17       focus of the committee, which is also very clearly related to the potential legislation that  
18       the committee is considering about changes to the elections process and related statutes  
19       in the United States.

20              I will also say, too, that my questions were directed not at your client's personal  
21       individual beliefs about any political issue but, rather, to the context of these calls that  
22       she made as an employee of the Trump campaign during the time period after election  
23       day and before January 6th.

24              But, that being said, your objection is noted for the record.

25              I think we've had enough of this colloquy about these calls for the present

1       moment.   I'd suggest this is a good time to take a break?

2             Mr. Brothers.   Yes.

3             The Witness.   Yep.

4             Mr. Brothers.   And, kind of -- and we can go off the record for this next part.

5             [REDACTED]   Yeah, let's go off the record now.

6             [Recess.]

1

2 [2:26 p.m.]

3

BY [REDACTED]

4

Q All right. We're going to go back on the record.

5

6

7

8

I just have a couple of questions for you, Ms. McCallum, about the kind of back and forth that we had before our lunch break, and then my colleague, [REDACTED] will talk to you about a few more documents, and then we hope to be able to wrap up, send you back on your way.

9

10

11

12

So just to recall our discussion earlier, you were telling us about a project that you were given, assignment that you were given while you were working for the Trump campaign which involved making phone calls to State or local officials in certain States during the time period after November 3rd. Is that right?

13

A Yes.

14

15

16

17

Q Okay. And I think the States that you identified for us where you made calls, either you or one of your colleagues that was working alongside you on this project, were Michigan, Georgia, Arizona, Nevada, and Pennsylvania, some combination of those States. Is that right?

18

A Yes, some combination.

19

Q Okay. Great.

20

21

22

23

And, Ms. McCallum, is it accurate to say that those States that we just identified at the time that you were making these calls, which you've told us was in the very end of November or early December, that those were States that were being contested by the Trump campaign?

24

A I'll preface it by saying, you know, I'm not a spokesman for the campaign.

25

I'd like to reiterate, I was not involved in any conversations of strategy or, you know,

1 plans that the Trump campaign was making. But I assume that would be an accurate  
2 representation, but I don't believe that I am, you know, the full -- the correct person to  
3 ask.

4 Q Understood. But as far as the context of the calls that you were being  
5 asked to make, did you understand at the time that the reason why these States were  
6 selected for calls was because the Trump campaign was contesting the election in those  
7 States?

8 A Can you repeat the question?

9 Q Sure. Not asking you to speak, you know, as to any legal strategy of the  
10 campaign or anything, but for the context of the assignment that you were given to make  
11 calls into these specific States at the time that you were given it, did you understand that  
12 the context was because the outcome of the election was being contested by the Trump  
13 campaign in those States?

14 A Yes, I believe that would be accurate to say that.

15 Q Okay. Did you make calls into any other States other than the ones that  
16 we've discussed that were sort of in your earlier responsibilities considered battleground  
17 States? One example might be Florida.

18 A Not to my knowledge.

19 Q Okay. And do you have any -- did you have any understanding at the time  
20 as to -- actually, let me rephrase.

21 Would you agree that the reason why you were not asked to make calls into a  
22 formal battleground State like Florida at the end of November or early December is  
23 because the Trump campaign was not contesting the outcome in that State?

24 A I believe that to be the case, but if you want a more clear answer, I would  
25 recommend asking whoever gave me the job assignment.

1 Q Okay. I think that's it.

2 [REDACTED] Before we go back into the documents, I'd pause.

3 Ms. Lofgren, do you have any questions?

4 Ms. Lofgren. No, I'm fine. Thank you.

5 [REDACTED] Okay. Okay. Great.

6 BY [REDACTED]

7 Q Great.

8 Ms. McCallum, I'm going to turn to the document behind tab 19. It's a pretty  
9 lengthy spreadsheet that you produced to us with the Bates 1528.

10 A Uh-huh.

11 Q Do you see that? And you can take some time to look at it. I'm not going  
12 to ask you about all the specifics, but if you want to just look through it and refresh your  
13 recollection as to the document.

14 And I'll say that this was how it was produced, unfortunately, to us. It was in a  
15 PDF format, so that's why it's hard to follow, which is also why we're not going to get too  
16 specific, because it is hard to follow where certain rows fall in connection with others.

17 A I'm just taking a moment to review. Sorry.

18 Q No, that's fine. Absolutely. Take the time that you need.

19 (Pause.)

20 A Okay.

21 Q So my first question is, we've been talking about what seemed to be like a  
22 spreadsheet that listed different elected officials and you had assignments and you would  
23 call the elected officials you were assigned to.

24 Is this the spreadsheet that you were referring to or some version of the  
25 spreadsheet that you were referring to earlier in your testimony?

1           A    Yes, this is.

2           Q    Okay.  And can you tell us, how did you use this spreadsheet?

3           A    I mean, you can see on there there's, you know -- it's obviously redacted, but  
4   contact information and the name of the senator or representative.  And then, you  
5   know, you can see where it says caller.  And then, you know, you can see in there VM  
6   for voicemail, notes, things like that.

7           Q    And caller, is that who is assigned to call the elected official?

8           A    Correct.

9           Q    On the first page, so it's Bates 1528 --

10          A    Yeah.

11          Q    -- there are six States.  So it's Arizona, Georgia, Michigan, Nevada,  
12   Pennsylvania, and Wisconsin.  I don't think we had mentioned Wisconsin before.  Do  
13   you recall that Wisconsin was part of the States that you and your other colleagues were  
14   calling legislators in?

15          A    I don't have any memory of calling anyone in Wisconsin.  Maybe there  
16   were calls.  I mean, this was over a year ago, so I don't remember much.

17               And about this first -- this first page, the 1 -- the 1528, this very first page in here, I  
18   don't remember ever using this page.  You know, like I mentioned earlier, it wasn't like  
19   one person was assigned to a certain State.  You know, I'm not sure really who or why  
20   this was made.  Maybe this was an idea and then it just wasn't followed up on.

21               I just want to be clear, you know, it's not like -- like this list that I was the State  
22   point of contact and it says Georgia beside it, and I just want to be clear that that's really  
23   not the case --

24          Q    No, thank you.

25          A    -- of how things played out.



1           Q    I appreciate that. And I was going to ask what State point of contact  
2 meant. So you're saying that even though it says State point of contact, and for you, for  
3 example, on this document it says you're for Georgia, in reality it didn't really play out  
4 that way and you all were helping out each other in the different States.

5           A    Right, and it really didn't play out that way. Also, because we talked about  
6 earlier, you know, we were all making calls into one State at one given time. You know,  
7 it wasn't like we were splitting up and doing it like that, so --

8           Q    That makes sense.

9           And when it says -- and you might not know this since you're not familiar with the  
10 first page, but it says State, I think, point of contact. Do you know what that refers to?

11          A    I think those are names of people who were working in the States at that  
12 time. I'm not -- not entirely sure, you know, what their involvement was there. Like I  
13 said, we didn't use this first page at all, so --

14          Q    For, like, Georgia, which -- where it says you're the point of contact,  
15 understanding your testimony that that's -- you know, you all were helping each other  
16 out, do you recall a Cooper at all being involved from the Trump campaign in Georgia?

17          A    The name Cooper doesn't ring a bell to me, no.

18          Q    For Michigan, there's a Shawn Flynn. Do you recognize that name?

19          A    Yes. Shawn also was a contractor for the National Republican Senatorial  
20 Committee, so I met Shawn when I was in Georgia.

21          Q    Okay. And --

22          A    And I believe he was the State director for election day operations in  
23 Michigan. I can't confirm that for Jesse or Jefferson though. I don't know who they  
24 are.

25          Q    And for Shawn Flynn, when you said he's the State director for election day

1 operations, that's for the Trump campaign?

2 A For the Trump campaign for the State of Michigan.

3 Q And you're not sure who Jesse Law or Jefferson Thompson -- Thomas, excuse  
4 me -- are?

5 A No, I don't know who Jesse Law or Jefferson Thomas are.

6 Q For Pennsylvania there's a blank. Do you have any idea why that would be  
7 blank?

8 A No. I mean, I'd like to go back and say that this wasn't a spreadsheet that  
9 was ever used, so I don't know what's on here.

10 Q Understood. And do you recall while you were making the phone calls, is  
11 this the spreadsheet or some version of it that you were making your notes on that we  
12 discussed earlier after you were able to make contact or maybe left a voicemail with an  
13 elected official?

14 A To the best of my knowledge, yes. You know, I don't -- yes.

15 Q And when you made these calls, and understanding it was a lot and it's been  
16 a long time, do you recall any of the elected officials that you called asking for, for  
17 example, evidence of alleged election fraud or voter fraud?

18 A Can you repeat the question?

19 Q Yes. When you were making the phone calls to the elected officials in at  
20 least five of the States, because you don't recall Wisconsin, do you recall any of the  
21 elected officials that you were able to actually talk to ask you for further evidence or  
22 further information about alleged election fraud that was taking place in their respective  
23 State?

24 A I don't remember any, you know, specific calls, you know, no one  
25 representative or senator comes to mind.

1           To answer your question generally, yes, and like I told you, I didn't have any  
2 background that I was given with the script, and I wasn't, you know, prepped to answer  
3 questions like that. So I would just take note of it and move on.

4           Q    And take note in the spreadsheet and then someone else would deal with it,  
5 presumably a superior, like maybe Michael Brown?

6           A    Maybe. I don't know if anyone ever followed up on any of those.

7           Q    Okay. Thank you. Let's -- I want you to turn to tab 10 and the document  
8 behind that. It's two pages, beginning with Bates, I think it's 606. You can take some  
9 time to review the communication.

10          (Pause.)

11          A    Okay.

12          Q    So my first question is, do you recognize what or do you recall what  
13 application you made this -- you had this communication with?

14          A    Google Voice.

15          Q    Okay. And do you recall this specific communication that we're looking at  
16 in tab 10?

17          A    Specifically, no, I don't really have a lot of memory of it.

18          Q    So my question was, it seems to me, and you can tell me if you remember  
19 this or not, that you might have called this individual and they couldn't talk so they just  
20 texted you right back.

21          A    Uh-huh.

22          Q    Does that seem accurate?

23          A    Yeah, that seems accurate. From reading this, that's also what I would  
24 assume happened.

25          Q    And after reviewing the document, based on the context, do you believe this

1 concerns the State of Georgia?

2 A Yes.

3 Q Now, just look at --

4 A Just because it says Georgia voters.

5 Q So if you look at your response, and you can look, I think, page two -- or,  
6 excuse me, Bates 807, has your full text. "Absolutely. Thank you so much for standing  
7 up for Georgia voters!"

8 A Yes, so I would assume that it is about Georgia.

9 Q So in that text message, you say, "Please look out for further contact from  
10 the campaign or Senate/House leadership on how to help correct this attempted fraud."

11 So my question is, do you recall what you were referring to when you said "this  
12 attempted fraud"?

13 A That's the same language that's used in the script, so I would direct you back  
14 to my answer on that.

15 Q So what you recall is you were just using language that had been provided to  
16 you in the script for, say, the State of Georgia.

17 A Correct.

18 Q Okay. And do you recall if you ever followed up -- and I believe if you look  
19 to the first page, which is Bates 606, it's Senator Summers. Do you recall if you ever  
20 talked on the phone with Ms. -- with Senator Summers?

21 A I don't recall, no.

22 Q Okay. Do you recall if you had any further communications outside of the  
23 communications that we're looking at here?

24 A No, I don't recall.

25 Q Okay. Go to tab 12. The first page is Bates 597, which is what I was going

1 to ask you about. You can take a look -- take a chance to review.

2 A Yeah, I have reviewed.

3 Q Okay. So is this the part of the text chain that you said that it was a  
4 random person texting you and you couldn't recall --

5 A Yeah.

6 Q -- or you didn't know who they were?

7 A This looks like the same -- same exact text chain where -- that we talked  
8 about earlier. And, you know, I'd like to repeat, I don't know who sent me these and  
9 so --

10 Q So --

11 A Anything on this page, I've never seen, so --

12 Q Okay. So this first message, "Well done!", exclamation point, from [REDACTED]  
13 [REDACTED], that phone number, you don't know who that is?

14 A No idea who that is.

15 Q And that link that's provided, it looks like it's a LinkedIn post. Do you recall  
16 clicking that link to review what was in that post?

17 A No, I don't think I would've clicked on any of these links.

18 Q Do you even remember this text chain?

19 A When I was doing my document review, you know, I obviously found them  
20 and I remembered, "Oh, someone sent me, you know, seven messages in 1 week with  
21 links." And, you know, beyond that, I don't have any memory of it.

22 Q So you're not sure why you received the text as part of this chain of "well  
23 done"?

24 A No, I have no idea. No one -- I -- I don't know. As you can see, I did not  
25 respond to any messages that were ever sent in this chain.

1 Q Got it. Let's -- if you could turn to tab 13, it's one communication, Bates  
2 1514.

3 A Okay. I've reviewed.

4 Q So if you look at the first message, it's from Michael Brown. He says,  
5 "Alright. This is now the EDO Michigan team. It's Tulip + Flynn." And the date he  
6 sent this, I believe, is December 1st, 2020.

7 Is that accurate based off of what you're looking at?

8 A Yes.

9 Q Okay. Do you know what EDO Michigan team or the EDO Michigan team  
10 refers to?

11 A I believe that just refers to, you know, the group of people I had said making  
12 calls, Kerrick, Chelsea, Madison, myself, and directed by Michael Brown, plus Shawn  
13 Flynn.

14 Q And do you know -- and EDO, just for clarity on the record, is that election  
15 day operations?

16 A Correct.

17 Q Do you know why he was calling it election day operations if it was  
18 December 1st when he sent the message?

19 A No.

20 Q And do you know who Tulip is?

21 A Tulip is the name of the street that the office in Philadelphia was on, so --

22 Q In the Trump campaign office in Philly?

23 A You know, I'm not sure whose name was actually on the lease at the  
24 building, but that's where, you know, like I mentioned James Fitzpatrick earlier, the State  
25 director, that was his office space that he was working out of, would assume that the

1 Trump campaign's name was on the lease.

2 Q So it's not -- Tulip does not refer to any specific person?

3 A No. It refers to a place, which I guess he's referring to all of us as Team  
4 Tulip.

5 Q Okay. And Flynn, you said, is Steve Flynn?

6 A Shawn.

7 Q Or, excuse me, Shawn Flynn. And what was -- how did he help with your  
8 effort in terms of calling elected officials?

9 A He was the State director for election day operations in Michigan. So, you  
10 know, I guess he was looped in on what we were doing. I don't have any specific  
11 memory of how this call went with Flynn or what Flynn said on this call, so --

12 Q Do you recall if Mr. Flynn, Mr. Shawn Flynn, was involved with any of the  
13 other States in the outreach that you and others did to elected officials there or just in  
14 Michigan?

15 A I think that's a question you'd have to ask Shawn. I believe it was just  
16 Michigan. He wasn't looped in on, you know, any other States that we were making  
17 these calls in, to my knowledge.

18 Q Was Mr. Flynn ever at, like, the meetings that you all had in Philly?

19 A Shawn -- I did not see Shawn Flynn in person until we were fully working on  
20 the Senate runoffs in Georgia. That was the first time I had met him in person.

21 Q And about when was that, when you were fully working on the Senate  
22 runoffs in Georgia, if you have an approximate date?

23 A Yeah. So like I said, our contract officially -- well, my contract, and I would  
24 assume Shawn's contract also, started on the 1st of December. But we arrived in  
25 Atlanta, Georgia, I would say, sometime between the 7th of December and the 9th or

1 10th of December, very early that month, so --

2 Q And is this chain kind of an example of, you know, Mike Brown saying,  
3 "Here's the team, this is our assignment, and we're going to, you know, meet up and then  
4 call elected officials"? Is this kind of an example of that?

5 A Yeah, this would be an example of us texting about, you know, one of the  
6 meetings that we've discussed previously.

7 Q And "we" meaning us today?

8 A "We" as in, yes, us in this room.

9 Q Okay. Great.

10 Let's go to tab 17. And this is a lengthier communication, so please take your  
11 time to review it. And this is Bates 1501 is the first page.

12 A There's a lot of these.

13 (Pause.)

14 Okay.

15 Q So my first question relates to this first message from Mr. Brown. It's sent  
16 November 30th, 2020. So his message is, "Good morning. We are going to call State  
17 leadership across the country later today. We may set up in the Union League or in my  
18 room, but we are going to win this thing. We are going to explain the process for  
19 legislative redress and tell them how to send representatives to th" -- and he forgot the  
20 "e" -- "electoral college. They've heard from lawyers who failed to explain it. So we  
21 will. And we will convince them. There's no team I'd trust more to do this. Touch  
22 base at 10 a.m. Be ready to deliver."

23 So my question is, he says, "They've heard from lawyers who failed to explain it."  
24 Do you know what he's referring to in that sentence?

25 A No.



1 Q Okay. Did he ever talk about lawyers who weren't making arguments that  
2 they should be or not in a way that he felt was effective?

3 A No, I have no knowledge of that.

4 Q Did he ever say how you all could deliver any sort of message in a more  
5 effective way than lawyers?

6 A No.

7 Q So it sounds like you don't really know what he's referring to here with  
8 "lawyers who failed to explain it."

9 A No. I mean, as you can see, I also never responded to these messages, so --

10 Q And a little bit further down, so Madi, Madison Crawley responds, "Copy."  
11 And then Michael Brown responds, "We're gonna be lobbyists. Woot."

12 Do you know what he means by "lobbyists"?

13 A No, I don't. I mean, I think that was partially, you know, exaggerating,  
14 jokingly. But, again, you'd have to ask him for what he meant. That's at least how I  
15 interpret this message reading it now. I don't know what he meant. That's something  
16 for him.

17 Q Did you ever ask him what he meant by, "We're gonna be lobbyists," what  
18 that meant?

19 A No.

20 Q Do you recall him saying that other times, that you all were going to be  
21 lobbyists?

22 A No.

23 Q If you turn the page to Bates 1502, at -- so November 30th, 2020, 7:53 a.m.,  
24 Chelsea Barnett writes, "Got it." And then Michael Brown responds, "Waiting to hear  
25 from Roman. But let's be ready."

1           Is this an example that you're saying, like, Michael Brown would, like, report to  
2       Roman and Roman would, like, give instructions for purposes of, like, the script and  
3       making calls to elected officials?

4           A     I don't know. You'd have to ask Brown, you know, what their relationship  
5       was and what they discussed.

6           Q     Okay. Do you recall hearing at times that Michael Brown was waiting for  
7       instructions from Roman? Do you recall that just in meetings or talking to him?

8           A     I recall that, you know, reading it now, reading it over text message. And  
9       Michael Brown reported to Mike Roman, so in any instance talking about any task it  
10      would not be uncommon for him to say, "I'm waiting on Roman to respond." I feel like  
11      that's a typical boss-employee relationship.

12          Q     And if you turn the next page to 503, there's a draft script. And if you go to  
13      505, I think it's a -- he makes some -- there's some slight changes.

14          Do you recall if this is the script that was used? And I believe this related to  
15      Arizona based off of the wording and the message. And this is on Bates 505 -- 1505.

16          A     You know, I don't recall if this ended up being the final version or not, no.

17          Q     But looking at it, does this look like they generally have kind of similar  
18      language and it --

19          A     Yeah, going back to the one -- you know, like I said earlier, it was slightly -- I  
20      guess it was slightly tweaked for each State. But this language looks the same as the  
21      draft we talked about before the lunch break.

22          Q     And that was a draft relating to the State of Georgia, I believe?

23          A     The one we talked about before lunch was about Georgia.

24          Q     Okay. Do you recall ever calling any governors or secretaries of state as  
25      part of this project?

1 A No. I don't think I've ever spoken to a governor or secretary of state at all.

2 Q How about any U.S. attorneys or representatives within the U.S. Attorney's  
3 Office of anywhere in the country?

4 A No. I don't know what kind of attorney Linda Kerns was, the one who I said  
5 I just drove to and from the meeting, but that's the only attorney I can think of that might  
6 be relevant.

7 Q So -- and no -- don't recall any calls made to, like, district attorneys within  
8 any of the States --

9 A No.

10 Q -- that you're making calls to? Okay.

11 [Discussion off the record.]

12 The Witness. Okay. Sorry. I don't really know what a district attorney is.

13

BY

14 Q Not a problem, that's fine.

15 Ms. McCallum, I wanted to ask a question about timing. Does this text chain that  
16 we've just been reviewing in tab 17, does it read to you like this was the first one of these  
17 call projects that you were given?

18 A Yeah, I think that would be safe to say, that this was very likely the first one.

19 Q Got it. Okay. So since it seems like the script is being developed on these  
20 texts, and we reviewed other scripts that were more stand-alone documents, do you  
21 think it's fair to say that this document that is dated November 30th kind of helps to pin  
22 down when those calls were made, that they would've been after this date of  
23 November 30th?

24 A Yes, I think so.

25 Q Okay.

1 [REDACTED] Ms. Lofgren, did you have any questions?

2 Ms. Lofgren. Nope.

3 [REDACTED] Great.

4 Ms. Lofgren. I'm just fine. Thank you.

5 [REDACTED] Wonderful.

6 BY [REDACTED]

7 Q Okay. So let's -- how about let's turn to tab 18, with Bates 1571.

8 A Okay.

9 Q You can take a minute to review it.

10 (Pause.)

11 A Okay. I'm ready.

12 Q So when we had just talked about tab 17 with Bates 1501 that referred to  
13 Arizona, and this also appears to refer to Arizona, is that right, this script on tab 18?

14 A Yes, that's correct.

15 Q And I don't think we had asked you before. Towards the beginning of the  
16 script it says, "I wanted to personally reach out to you on behalf of the President as you  
17 will be a crucial part of President Trump's reelection."

18 Had President Trump ever asked you to make these calls himself?

19 A No.

20 Q Okay.

21 A I'd like to reiterate, I did not write the script.

22 Q Understood. And so this script, do you know who wrote this script for  
23 Arizona on Bates 1571?

24 A Yeah. I, you know, was comparing it to the documents we were reviewing  
25 earlier, this script that's on 1505 and beyond, on the 17 tab, yeah, and they don't seem to

1 vary significantly. So my assumption in looking at this is these were the, you know,  
2 more slight changes.

3 Q From Mr. Brown?

4 A I assume.

5 Q Okay. In looking at this, it looks similar to the other -- kind of the other  
6 scripts we've talked about today.

7 A Yes, it looks pretty similar, yes.

8 Q Okay. And if you go towards the bottom, it says -- there's a sentence, "This  
9 effort is happening in other States where fraud was rampant, including Pennsylvania,  
10 Arizona, and Georgia." I wonder if that might be -- it looks like it might be a typo if this  
11 is about Arizona, but that sentence refers to other States, and Arizona --

12 A Yes, I would assume it's a typo. I also don't know if this is, you know, the  
13 final script that was followed.

14 Q And here, if you go towards the bottom, it says, "When there is a resolution  
15 to appoint electors for Trump, can the President count on you to join in support?"

16 Did you do any work as part of your role for the Trump campaign involving any  
17 resolutions to appoint electors for Trump?

18 A Can you repeat the question?

19 Q Yes. Part of your job responsibilities for the Trump campaign, did you ever  
20 do any work to help support a resolution in individual States to appoint electors for  
21 Trump?

22 A No.

23 Q Okay. Do you know what that refers to, what "resolution to appoint  
24 electors for Trump" refers to?

25 A I don't.

1

BY [REDACTED]

2

Q Oh, one question about this one, just on the back of that page in tab 18.

3

There are some additional talking points under the heading, "Curveball Quick Tricks."

4

After looking at those, do you recall whether you ever delivered these talking

5

points after the script on the previous page?

6

A I'm taking a minute to read through them.

7

Q Sure.

8

A No, I don't remember. As I stated earlier, mostly what I did was leave

9

voicemails. There are very few people that I actually spoke on the phone with. And

10

my conversation with them would be whatever is recorded in the notes in the

11

spreadsheet exhibit.

12

Q Okay.

13

BY [REDACTED]

14

Q Did you ever do any in-person meetings with any of the elected officials or

15

only voice -- through phone calls or text?

16

A No, I never met any State representatives or State senators.

17

Q So if you want to, let's see, turn to tab 20, in that first document, Bates 1648.

18

A Uh-huh.

19

Q And this is also a longer communication, so if you want to take your time to

20

review it. So I want to ask you very detailed questions about it.

21

(Pause.)

22

A Okay. Yeah, I think we can go ahead and review this.

23

Q So did you have a chance to review it?

24

A Yes.

25

Q And does this, reviewing the communication, does this relate to your work

1 for the Trump campaign?

2 A This relates to, I think I mentioned it earlier, with the Wisconsin  
3 incapacitated voters research, which I don't know if I stated this, but after I left  
4 Philadelphia, at that point I was fully focused on the Senate runoff in Georgia. And with  
5 this conversation and this project being the exception, I solely worked on work related to  
6 the NRSC and the Georgia Senate runoff. This is the only other thing that I did for the  
7 Trump campaign after I left Philadelphia.

8 Q Understood. Yeah, so I was going to ask, because the date is  
9 December 23rd and it seemed a little bit later than --

10 A That's correct. That was what I was referring to is right before Christmas  
11 when we were all at home. This is the research that I was talking about.

12 Q So when -- like, were you working through a list?

13 A Yeah, I can explain this a little more. I'm wondering if it's a little bit out of  
14 order or --

15 Q I think some -- the photos I think you were trying to show, which was great,  
16 like the entire chain, so there's sometimes repeats.

17 A Right.

18 Q But it's just to capture the whole conversation. So it's a little confusing in  
19 that way, but it should be in the right order. It's just you might see, like, duplicates.

20 A Okay. So this started with, you know, Pete, Peter McGinnis, who I  
21 mentioned worked, you know, in an assistant role for Mike Roman, reaching out to  
22 myself and Madison Crawley about doing this research.

23 So Peter provided Madison and myself with a list of incapacitated voters in  
24 Wisconsin. And basically the idea was we just googled their name or, you know,  
25 Facebook search bar, something like that, to just see if they were actually incapacitated

1 or not.

2 Q So I recall from your production you had -- there were, like, Facebook  
3 posts --

4 A Uh-huh.

5 Q -- and I think it looked like you were doing internet research on individuals  
6 and, like, where they were maybe at certain points of time. Is that potentially, like,  
7 related to this project?

8 A Yes. So -- and it's been a while, so correct me if I'm wrong, but  
9 incapacitated means, you know, you are stuck in your home, for lack of a better word.  
10 So I think their reason -- reasons -- they were on vacation or something, you know, during  
11 election day would be part of the reason as to why they, you know, maybe were not  
12 incapacitated.

13 Q Did Mr. McGinnis or anyone else ever say why -- what this information was  
14 being used for?

15 A There is -- I'm sorry. I'm looking for it. I know it's -- so he does respond,  
16 and it's the last photo in this. It's 1654. He responds and says, "Email sent off," you  
17 know. And then the next message says, "Jon said we did an awesome job."

18 I don't know who Jon is. It's clear that he sent an email to someone and then Jon  
19 responds and says we did an awesome job.

20 Q And with respect to, if you know, the "47 hits total," would that be 47  
21 individuals who did not appear incapacitated?

22 A I would assume so.

23 Q Okay. And it looks like this -- all this work was done in the span of maybe a  
24 long day. Is that right?

25 A Yes, this all just seems to be from one day.



1 Q And so this was the only type of project that you did?

2 A Right. And then with this day Peter and Madison and myself would, you  
3 know, regroup and say, "Hey, you know, how much progress did you make?" things like  
4 that, during the day. But after that I never heard anything more about this project.

5 Q If you go to the second to last page, it's on Bates 1653. And if you look at  
6 Ms. Crawley's response towards the bottom of the chain, "Yeah, my volunteers just  
7 wrapped up 801 stuff, so I need to take care of that."

8 Do you know what "801 stuff" refers to?

9 A That would refer -- during this time period Madison was also a contractor  
10 with the National Republican Senatorial Committee. That would be related to work  
11 being done for the Georgia Senate runoff.

12 Q Okay. Great.

13 A And to clarify, my message right before that was I said I have stuff to catch  
14 up on with Christina. Christina was also a contractor with the National Republican  
15 Senatorial Committee.

16 Q Okay. So there was some overlap and you all were --

17 A Correct, and I was working with Christina again on things solely related to  
18 the runoff at that point.

19 Q Understood.

20 Moving right along.

21 [Laughter.]

22 If you can turn to tab 21, and that's another text chain, just a couple of pages,  
23 Bates 1576.

24 A Uh-huh.

25 Q Take some time to review it.

1 (Pause.)

2 A Okay.

3 Q So my first question is, do you happen to -- after reviewing this  
4 communication, do you have a sense of when this communication took place? Because  
5 we don't have a date on this. We have --

6 A I see that these messages on the second page, they have a time stamp of  
7 January 5th at 11 p.m. I believe that the messages sent before that were also from  
8 January 5th.

9 Q Okay. That's helpful.

10 A But we can confirm that.

11 Mr. Brothers. Yeah, that shouldn't be too hard to confirm.

12

BY 

13 Q Yeah, after if you want to just confirm the date, that'd be helpful.

14 A Okay.

15 Q Thank you.

16 And in his first message, Mr. Brown says, "Mission accomplished. About to Uber  
17 home." Do you know what he was referring to when he said "Mission accomplished"?

18 A I really don't.

19 Q Okay. And I see that -- I believe it's -- this communication is just between  
20 the two of you. Is that right?

21 A Madison Crawley is also in this group message.

22 Q Okay. So it's three people.

23 Do you know, with -- it looks like someone hearted that message.

24 A Uh-huh.

25 Q Do you recall if that was you that hearted the message or Ms. Crawley?

1           A     If it's blue, that means that I put a heart on it; and if it's not, it means that  
2 someone else did, which would either be Madison or Michael.

3           Q     So for maybe the, "This has got to be the cover a book" -- I think he forgot  
4 "of" -- "a book I write one day."    You hearted that message.

5           A     I did.

6           Q     Do you recall why you hearted the message?

7           A     I don't.   And, you know, I responded after that and said, "Pretty freaking  
8 awesome.   No joke."   I was mostly referring to the photo.   I thought the photo was  
9 cool, you know.

10           I'm a low-level campaign staffer.   Anytime anyone goes to Capitol Hill I think it's  
11 cool, so --

12           Q     So was it your understanding that when Mr. Brown took that photo he was  
13 in front of the Capitol in Washington, D.C.?

14           A     It looks like a selfie taken outside of the Capitol Building.

15           Q     Did Mr. Brown ever tell you what he was doing in Washington, D.C., around  
16 January 5th?

17           A     Not specifically, no.   I knew he was there.   And part of my job with the  
18 NRSC is I helped Michael Brown with a lot of his expense reports.   So I obviously knew  
19 he was there because he wasn't with me in Atlanta, and I was compiling expense reports  
20 for him.   And I did the same thing for James Fitzpatrick, basically just gathering up  
21 receipts and entering them into Concur, so --

22           Q     So you don't know what mission he might have accomplished on  
23 January 5th?

24           A     I don't.

25           Q     And you don't know what book he could potentially write and use that photo

1 of?

2 A I do not, no.

3 Q Outside of this text communication with Mr. Brown and Ms. Crawley, do you  
4 recall having other conversations with Mr. Brown about what he did in Washington, D.C.,  
5 on January 5th?

6 A Really the only conversation I had with him is, you know, "Hey, while I'm  
7 gone, will you help with my expense report?" And somewhere in the document  
8 production I believe that there are messages related to that too, but I could be wrong.

9 Q So --

10 A Yes, that would be the next tab, the message after the 22nd. Those, you  
11 know -- when he gives me the date, January 2nd, I believe that this was referring to a  
12 missing date on a receipt, so --

13 Q Yeah, so we can turn to tab 22, which is Bates 1578, since you brought it up.  
14 And I wasn't sure if this related to the doc, the conversation in tab 21.

15 A Yeah, I believe that these were going on around the same time as the group  
16 message with Madison.

17 Q Okay. In his -- in that chain, if you look, he says, "Just landed. I've never  
18 flown clutching my bag before." And you write, "hahaha, that bad? Just finished it.  
19 Whenever you want to look over." And his response is, "Just didn't want to let the docs  
20 out of my sight. Thank you. I will look shortly." And you write, "Oh, duh. I  
21 assumed you were talking about turbulence."

22 Do you recall, did he ever -- did Mr. Brown ever tell you why he was clutching his  
23 bag while he was flying to D.C.?

24 A Well, he does say after that that he didn't want to let the docs out of his  
25 sight. I don't know what documents he's referring to, assuming he was flying with

1       whatever he was at the Capitol to do.

2               Q     So he never -- Mr. Brown never told you what documents he was bringing  
3       with him to Washington, D.C.?

4               A     No.   I mean, the only context I have is the docs.   I don't remember any  
5       conversations from that day or ever about, you know, what he's referring to.

6               Q     So Mr. Brown never told you about any meetings that he had in Washington,  
7       D.C., around January 5th?

8               A     No.

1

2

BY [REDACTED]

3

Q Could we go back really quickly to the document behind tab 21,

4

Ms. McCallum, on the second page --

5

A Yes.

6

Q -- that you produced?

7

So Michael Brown, after the exchange with the photo that was on the previous

8

page, writes, "I should probably buy Roman a tie or something for sending me on this

9

one."

10

Do you think that refers to his boss at the time on the Trump campaign, Mike

11

Roman?

12

A Yes.

13

Q Okay. And then he writes, "It hasn't been done since 1876, and it was only

14

three States that did it."

15

What did you understand him to be referring to there?

16

A I honestly have no idea.

17

Q I'll note, this is on -- this exchange happened on January 5th, the day before

18

the U.S. Congress was set to convene for a joint session to certify the outcome of the

19

Presidential election on January 6th. That's right?

20

A Yes.

21

Q Correct?

22

A That's -- yeah.

23

Q Yeah, okay. Does that help to jog your memory about what Mr. Brown was

24

doing in D.C., what the documents were?

25

A I mean, I think you'd have to talk to Michael Brown to ask him specifically

1     what he was doing there. You know, if these things are happen -- if this conversation is  
2     happening on January 5th, I assume that it has something to do with what's happening  
3     the next day.

4             But like I said, I was working for the NRSC at that point in time. I had, you know,  
5     no job assignments related to the Trump campaign during the, you know -- during  
6     January at all, so --

7             Q     Okay. But you were still working with Michael Brown, right?

8             A     Yes, I was working with Michael Brown in the capacity of he was also a  
9     contractor with the National Republican Senatorial Committee, as was Mike Roman.

10            Q     Did you understand Michael Brown to be focused exclusively on the Georgia  
11     NRSC work, or was he also -- was he at that time still working for the Trump campaign?

12            A     I would assume, based on this message, he was still working on Trump  
13     campaign, you know, assignments, but I really can't confirm that.

14            Q     Okay. I note in the context of January 6th that 1876 is the year of a  
15     contested Presidential election.

16            A     Okay.

17            Q     Does that bring up any recollections for you about conversations that you  
18     had with Michael Brown about his trip to D.C. and the documents that he was bringing  
19     with him?

20            A     No. I mean, like I said, no one talked to me about anything related to that.  
21     And at that point I was working in Georgia, and at that point the only things that people  
22     talked to me about were volunteers coming in and out of the office and what we were  
23     having for lunch that day and, you know, if there was enough office supplies because the  
24     runoff was taking place on the 5th. So anything that I did on the 5th was related to the  
25     Georgia Senate runoff.

1 Q Okay.

2

BY [REDACTED]

3 Q Do you know if Ms. Crawley traveled with Mr. Brown on -- to D.C. on  
4 January 5th?

5 A No. And to that, I'd point you to -- on it would be the second page on tab  
6 21, where Michael says, "What's the mood in the room?" He's referring to the room  
7 that we were all in for -- while we were working for the NRSC, so basically the  
8 headquarters office of the runoff. So, you know, Madi responds and says, "still pretty  
9 high." So Madison and myself were both in that room in Atlanta, Georgia.

10 Q Okay. And so did you have to expense this report -- expense or help  
11 process Mr. Brown's expenses related to this January 5th trip to D.C.?

12 A I wouldn't know that. I would assume, you know, that's obviously not  
13 something the NRSC would pay for.

14 Q Okay.

15 A If you look at it, you know, on tab 22, he's talking about a receipt on  
16 January 2nd.

17 Q Yep.

18 A I don't know if there are any receipts after that.

19 Q Okay.

20

BY [REDACTED]

21 Q Do you know where Michael Brown works now?

22 A I don't, no.

23 Q Okay. Are you still in touch with him?

24 A Occasionally. I don't know if he's currently employed.

25 Q Okay. And now what about Mike Roman? Do you know where he works



1 now?

2 A No clue.

3 Q Okay. Are you still in touch with him?

4 A No.

5 Q Okay.

6 A Not regularly at all.

7 [REDACTED] Okay.

8 Maybe we can just ask, Ms. Lofgren, before we conclude, any questions from you?

9 Ms. Lofgren. No. Thank you very much for asking.

10 [REDACTED] Okay.

11 BY [REDACTED]

12 Q So we just wanted to just turn to January 6th.

13 Where were you on January 6th, 2021?

14 A In Atlanta, Georgia, at the Georgia Republican Party headquarters office.

15 Q Did you get a chance to watch the rally that took place or the event that took  
16 place on the Ellipse on January 6th in Washington, D.C.?

17 A There was -- in the room that we were working out of there was a projector  
18 that had some media station on, FOX News, C-SPAN, something of that nature. So all I  
19 would've watched is whatever was being broadcasted on the news.

20 I don't remember watching any part of the rally specifically. I obviously  
21 remember looking at the TV and seeing, you know, what was going on on January 6th.

22 Q And when you say what was going on on January 6th, are you referring to  
23 the attack on the Capitol Building? Is that what you're referring to, or you're referring --

24 A Yeah, I remember seeing that on TV, you know, media reporting on that, and  
25 obviously the building was shut down, things like that, updates that were media

1 information.

2 Q With respect to the event on the Ellipse on January 6th, did you have any  
3 involvement in the planning or organization of that event?

4 A No. I mean, I'd like to go back to what I said earlier. With the exception  
5 of the Wisconsin research, I did not do any work for the Trump campaign after I left  
6 Philadelphia in early December.

7 Q And I think you understand what the select committee is looking into. Do  
8 you have any information to provide to the select committee relating to the attack on the  
9 Capitol on January 6th, 2021?

10 A I do not.

11 [REDACTED] Okay. I think that's it. We'll go off the record. Well, it's 3:25,  
12 and I think, based on our conversations earlier, your objections are noted for the record,  
13 but I think at this point we can close the deposition.

14 Mr. Brothers. Got it. Sounds good.

15 [Whereupon, at 3:25 p.m., the deposition was concluded.] 3:25 p.m.

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Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

---

Witness Name

---

Date